

## Environmental Impact Statement Comment Form

### EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by February 24, 2017

Online at: <http://www.whidbeyeis.com/Comment.aspx>

By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
\_\_\_\_\_

3. Address \_\_\_\_\_

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

### Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

- The EIS must address the inevitable impact on Coupeville Middle School and High School
- How will the navy prevent future contamination of local wells and aquifers from PFOAs and other flame ~~retardants~~ retardants
- The EIS must address how the decrease in tourism, farming, and property values will affect the tax base and how that will, in turn, affect the ~~budget~~ budget, and tax base of the entire county.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances

Freeland, WA 98249

Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." This is despite recent studies finding toxic levels of PFASs in eight wells in the Coupeville area due to the use of Navy firefighting foam. How will a 6-fold increase in flights in the Coupeville area NOT lead to an increase in accidents or emergencies requiring further use of these toxic chemicals? Finally, as more testing is conducted and likely more wells found positive for toxins, how will the Navy compensate the residents, farmers and businesses who will no longer be able to use their water? Provided bottled water is NOT sufficient, as farmers cannot irrigate crops, and people cannot shower, clean, garden, or conduct their lives on bottled water alone. The Navy MUST address how no significant harm will come to Coupeville residents from water contamination issues.

Freeland, WA 98249

The Navy must address the potential economic impacts of its program expansion on the county. Just this week, The Sustainable Economy Collaborative, a citizen group led by globally-recognized expert on community economics, Michael Shuman, release a report which concludes the following: 1. An estimated \$5.7 million per year in sales and property taxes is lost from Island County's tax revenue because military installations pay no property taxes and on-base purchases are exempt from sales tax. 2. The Federal government compensates the county for only 20% of the cost of public education of dependants of federal employees. 3. Property values in areas affected by excessive jet noise have declined by nearly 10 million dollars. 4. Island County residents pay \$2.3 million per year for health costs due to the Navy's activities. This proposed expansion of Growler flights and influx of thousands of Navy personnel to the island will only exacerbate these negative impacts. How will the Navy reimburse the county for the increase use of publicly funded infrastructure by military personnel? How will the Navy reimburse the county for its lost tax base due to further decrease in property values from increased jet noise? Finally, how will the Navy reimburse island families whose medical costs increase due to increase exposure to jet noise?

- 1.a. Thank You
- 12.b. Invisible Costs
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.m. Education Impacts



Freeland, WA 98249

The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam. In one of Coupeville's four wells tested, PFOA was found between 59 and 62 ppt; current test results of 8 private wells range up to 400 ppt. A six-fold increase in flights will only increase the chance of accidents requiring the use of flame retardants. How does this reconcile with the Navy's responsibility to prevent any future contamination of wells or aquifers by toxic chemicals? Also, the EIS must address how the Navy will economically reimburse landowners whose wells have already been affected. Finally, The EIS must consider the paramount historic, cultural and economic significance of Coupeville's farmland, and how the potential contamination of these soils and wells will affect the area's agricultural economy.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.k. Compensation to Citizens for Private Property

Freeland, WA 98249

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

Comments on Navy's DEIS

██████████  
Dec 9 2016

I am a citizen of central Whidbey Island and am highly concerned with the Navy's plans to increase the use of Growler jets during training over the Outlying Field near Coupeville, WA. As a farmer, my livelihood is based in the outdoors and depends on being able to spend long hours in the field without exposure to health-related risks. While my operation is not affected by the current range and frequency of flights, I fear the expansion of flights will impact my ability to do work. I know several farmers who are currently exposed to ear-damaging noise levels several times a day, and are considering moving away from Coupeville to start business elsewhere. Obviously, this would have a tragic impact on the community, not only for the local economy but also for the vibrancy and culture heritage of the island as a whole. The Coupeville area is known statewide for its incredibly agricultural soils, historic farms and buildings, scenic landscapes and thriving farm community, and this community is at risk. Based on many conversations with community members and tourists, I believe the noise from the Growlers has already diminished the number of people who wish to work in, live in and visit this special place. An *increase* in jet noise risks could severely threaten our central island economy.

The DEIS, in my opinion, drastically underestimates the noise level produced from these flights. While driving, I have experienced sound levels that shake my inner ear drum. I can't imagine the daily impact this has on school children's ability to learn and local employees' ability to concentrate at work. Also incalculable is the impact on local wildlife's ability to hunt, sleep and communicate.

While I respect the Navy's need to sufficiently train their pilots, the tradeoffs for the local community and environment just aren't worth it. I deeply hope that the Navy will reconsider their plans to expand Growler flights over our community.

With respect,  
██████████  
  
██████████

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 2.a. Purpose and Need
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Lopez Island, WA 98261

As a resident of Lopez Island who is affected by noise from EA-18G overflights I support adoption of measures listed below to ensure a realistic Final EIS: 1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. ACTION: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model. 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. ACTION: Noise levels should only be averaged over active flying days. 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive. ACTION: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe." 6. The Draft includes some independent noise measurements and ignores others. ACTION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.

- 1.a. Thank You
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects





EA-18G EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

RE: Training at OLF Coupeville

We are writing regarding the EIS for OLF Coupeville. We want to express our concern about increased activity by a noisier aircraft at this field. Bucking the federal government, especially the military, seems futile but one can always hope that if you get enough comments you will downsize your operations here. We are not out to close the airfield, although to be truthful, if it should disappear, it would not hurt our feelings. We know that your response would be that our economy would suffer, and it may in the short term, but in the long term it will grow due to the desirability of living here. If there were no flight noise, it would be even more desirable.

Our concerns are:

- The inordinate increase in the number of operations at the airfield. A 36%-475% increase is a lot!!! Even at the present level, we cannot work or recreate outside and it is difficult to sleep when flying is going on. If flights were to increase as much as proposed, we would be prisoners in our homes. We truly believe that if decision-makers (and their families) who have good hearing were to come when the jets are practicing, they would agree that it is way too loud. The decisions are made by people who have not experienced the noise or possibly are deaf already. You need to know what you are deciding about.
- Whether your noise meters record it accurately or not, the noise is more irritating and louder than with the old jets.
- We have concerns on how the noise level was determined. We understand that the level is determined by an average of times when planes are not flying averaged with noise when they are and that doesn't make sense to one's ears. You cannot average the noise from the atomic bomb with the non-noise for the rest of the year. The one time damage cannot be repaired.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 7.a. Regional Land Use and Community Character

- We live in a historic district with natural beauty and this is what people come here for. Our town's economy is dependent on visitors and such a large increase in noise will deter our visitors.
- We're sure that the desirability of living where we do will decrease, as will the value of our property.

If you should go ahead with your plans, there should be some monetary compensation for people living under the flight zone so we can retrofit our houses, and the navy should start purchasing places as they start going on sale so they will affect less people. That way, at some point, you won't have to worry about who's living under the flight zone.

We hope that you will be reasonable in coming to your decision.

Sincerely,

A large black rectangular redaction box covers the signature and name of the sender.

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military) \_\_\_\_\_

3. Address \_\_\_\_\_

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

PLEASE KEEP FLIGHT SCHEDULES AS THEY ARE NOW.  
DO NOT INCREASE # OF FLIGHTS PER DAY.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

**For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)**

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## 1.a. Thank You

langley, WA 98260

I'm a 30 year resident of this island and moved here to raise a family. My second son was born here. Im been a business owner for 20 years and have employed dozens of locals through the years. We moved here for nature...peace. A quality of life that is fast diminishing with the presence of the Growlers. Both of my sons, now at an age to raise their own families,have always said they'd return to the island to raise their own children. Both are thinking twice about it now given the presence of the Growlwers.



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) **Provide written comments** at today's public meeting; (2) **Speak with the stenographer**, who will record your comments; (3) **Submit your comments on the project website** at [www.whidbeyeis.com](http://www.whidbeyeis.com); or (4) **Write your comments and mail them** to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

- 1. Name
- 2. Organization/Affiliation
- 3. Address  COUPEVILLE WA 98239
- 4. E-mail
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

NOISE MODEL ON EXISTING FLIGHTS TO INSURE THAT  
SHOULD BE VALIDATED

THE PREDICTED NOISE LEVELS ARE CONSISTENT WITH  
ACTUAL FIELD MEASUREMENTS.

Please print • Additional room is provided on back  
Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation

Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives

While I understand it is necessary for pilots to practice, I think there are alternatives to the proposed ideas. I am the leader of an organization which gets families outside. With more jets I fear that we will be living indoors trying to get away from the noise. This will impact our environment, health, and morale.

Langley, WA 98260

I am against this expansion as it will negatively impact my home and community. When I moved here I knew the Navy was here and accepted it as a part of my new locale. This large expansion is a dramatic change and is in opposition to the reasons I am here. This negatively impacts the natural beauty, quiet, environmental health of our home. Please reconsider this expansion.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 2.n. Alternatives Considered But Eliminated
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



1.a. Thank You

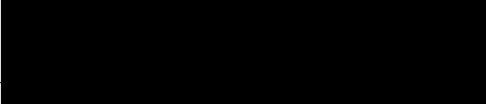


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1. Name 

2. Organization/Affiliation 

3. Address 

4. E-mail 

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available.

Thanks for your time & the study  
I like its completeness!

I support the OLF.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

1. First Name 

2. Last Name 

3. Organization/Affiliation shawine

4. City, State, ZIP Shaw Island WA 98286

5. E-mail \_\_\_\_\_

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private



**Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

- 1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**

- 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**

- 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**

- 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

**Action: Noise levels should only be averaged over active flying days.**

- 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**

- 6. The Draft includes some independent noise measurements and ignores others.

**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

01/08/16

[www.QuietSkies.info](http://www.QuietSkies.info)

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7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

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1.a. Thank You

Lopez Island, WA 98261

I was at our residence at [REDACTED] from Nov. 7-13. The noise from the Growlers occurred from early morning, shortly after 8:00 AM until late afternoon most days. Walking, working outside, walking the dog, being inside the house--the house is so loud and unbearable. Our peace and quiet is constantly disturbed at what was to be a place of quiet. Sometimes the noise is directly overheard and it's extremely loud.

clinton, WA 98236

Civilians should not have to lived with the stress of intense and loud noises. It truly is a life stressor that considerably lowers one's ability to enjoy life and home. Even on S Whidbey we often hear the roar of these planes and its heart stopping and upsetting. We should all be able to enjoy our homes in peace and quiet. I understand the Navy must be somewhere, but, this isn't right or fair for any of us. There are many more uninhabited areas that could be used. Whidbey is a vacation destination and instead of making it attractive, it makes it hell.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

4.r. Nonauditory Health Effects



Lopez Island, WA 98261

Comments 1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. ACTION: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide “scientifically and legally defensible noise assessments” of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model. 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. ACTION: Noise levels should only be averaged over active flying days. 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive. ACTION: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe." 6. The Draft includes some independent noise measurements and ignores others. ACTION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument. ACTION: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA. 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing. ACTION: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training. 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation areas that are being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI. ACTION: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties. 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment. ACTION: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision. 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.” ACTION: Supplement the EIS to address deficiencies identified in

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

comments and offer further opportunity for public comment before the Final EIS is prepared.

Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

Open House Comments

Fill in and Submit at the Open House

- 1. Name \_\_\_\_\_
- 2. Organization/Affiliation \_\_\_\_\_
- 3. Address \_\_\_\_\_
- 4. E-mail \_\_\_\_\_
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like your name/address kept private
- 7. Please check here  if you would like to receive a CD of the Final EIS

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered but Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

- 1. Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).
- 2. Recognize the impacts of low frequency Growler noise on health.
- 3. Incorporate San Juan County noise reports in the EIS analysis.
- 4. Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.
- 5. Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.
- 6. Commit to Mitigation Measures and timelines in the Record of Decision.
- 7. Add your own comments here:

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(Continue on the back)



# Public Meeting Comment Form

Thank you for attending the public meeting on the Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) Provide written comments at today's public meeting; (2) Speak with the stenographer, who will record your comments; (3) Submit your comments on the project website at www.whidbeyeis.com; or (4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation Capeville Resident (Retired) Navy Dependent

3. Address Capeville VA 98239 (ex) wife of pilot/pilot x 24 yrs Whidbey resident 1992-2001, 2009-present

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

I came tonight to get some questions answered - thank you for the dialogue. I will follow-up with more detailed comments.

My general concerns  
① consolidation of all electronic warfare @ whidbey - I feel its a security risk operationally + asks whidbey to bear the brunt of impact  
② Effect of 40-700 ppl coming on housing inventory, which has already at ~10% vacancy.  
③ ↑ # of flights in Capeville will harm our economy + health

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.i. Housing Access and Affordability
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.r. Nonauditory Health Effects

→ right (over)

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

Right now, the Navy is not able to maintain current operators without excessive noise causing physical + psychological harm.

I can only imagine how much worse it will be with the large increase in operators recommended in the EIS

I seriously recom. I recommend you seriously consider siting these new guidelines elsewhere.

And we are very concerned about perfluorates in our water.

Thank you,

[Redacted] MA MS RD CD, CSD  
Clinical Dietitian [Redacted]

For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

Please print  
Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Coupeville, WA 98239

Single-siting all of us EW asset into one place is a significant operational security risk. Why are you considering it? Especially on an Island served by a bridge and two ferries which makes NAS Whidbey a prime terrorist target.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

Coupeville, WA 98239

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Why has the Navy not looked at siting the new Growlers elsewhere? Options: 1. MCAS Cherry Point - despite DEIS statements, they have just as much commonality as Whidbey as they also have EA-6B. The Prowlers that are leaving can be replaced with Growlers. What are the statistics of how NALF Fentress, MCAS Cherry Point and NAS Oceana runways are currently used, by aircraft and by type of flight in the syllabus? 2. NAS Kingsville, TX. Is at sea level. Remote area. NALF Orange Grove for FCLPs. Why are you not considering NAS Kingsville? 3. NAS Fallon, NV Was not mentioned at all and is extensively used for workups. Why are you not listing Fallon as an option?

Coupeville, WA 98239

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.h. Next Steps

I request that the final EIS also have a public comment period. Thank you, [REDACTED]



Coupeville, WA 98239

██████████ Coupeville, WA 98239 ██████████  
 cell February 24, 2017 EA-18G Growler EIS Project Manager Naval Facilities  
 Engineering Command Atlantic 6506 Hampton Boulevard Norfolk, VA 23508 Attn: Code  
 EV21/SS To Whom It May Concern: Please find enclosed my comments for the US Navy  
 Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval  
 Air Station Whidbey Island Complex. While I very much appreciate the time and effort  
 that went into the preparation of the Navy's DEIS, I do not feel it completely represents  
 the impact of increasing Growler operations, especially to the Central Whidbey Island  
 community. Therefore, I offer the following comments. 1. The Final EIS needs a public  
 comment period of 60 days. Not having public comment after the draft period is  
 unacceptable, especially when a preferred alternative was not chosen, and when only  
 conceptual Accident Potential Zones (APZs) are drawn. 2. Increasing operations at OLF  
 Coupeville will heavily impact the economy of Coupeville and Central Whidbey, which are  
 dependent upon tourism and recreation. People come to Coupeville to visit the second  
 oldest town in Washington, hike Ebey's Landing and visit the National Historic Reserve,  
 folks get married on our farms here and they come from far and wide and to have  
 farm-to-table outdoor dinners. All these activities support our local economy. Increases in  
 flight noise are directly incompatible with the economy of Central Whidbey. If APZs are to  
 be drawn, they will further hamper economic activity in the area by prohibiting many small  
 and home-based businesses as well. 3. Growler noise is already poorly controlled, and  
 has lead to a decrease in property values. Adding more Growlers, without managing  
 noise properly, is not acceptable. Since the Prowler to Growler transition, flights have  
 exceeded the existing EIS and noise has been poorly managed. Per economist Michael  
 Shuman's report, "Invisible Costs: The \$122 Million Price Tag for The Naval Air Station  
 Whidbey Island," real estate values have plummeted \$9.5 million since the Growler  
 transition. Adding more planes would worsen this decline. Mr. Shuman's report can be  
 found here:  
[https://sustainableeconomycollaborative.files.wordpress.com/2017/02/invisible-costs-final\\_2\\_20.pdf](https://sustainableeconomycollaborative.files.wordpress.com/2017/02/invisible-costs-final_2_20.pdf)  
 4. Current levels of jet noise at the NASWI complex are considered a health  
 hazard by the Washington State Department of Health. Per the WSDOH report of  
 February, 2017: "...noise levels similar to those reported from NAS Whidbey Island  
 Complex described in all recent reports pose a threat to public health." Please see the  
 report here:  
<https://www.islandcountywa.gov/Health/PublishingImages/Pages/News-from-Health-Officer/DOH%20Noise%20Review.docx>  
 An increase in operations only increases the noise  
 and the threat to public health. 5. Single-siting the Growler at NAS Whidbey Island is a  
 risk to operational security and military readiness. Given the Navy holds all the electronic  
 warfare jet assets for the entire US military, having all the Growlers here (plus the 35-36  
 the Navy are proposing to add), is an OPSEC risk due to terrorism and natural disasters.  
 The DEIS states that the single siting decision is reviewed annually by the Chief of Naval  
 Operations' "Strategic Laydown and Dispersal Plan," but this is not referenced in the  
 DEIS, nor available online. The 2008 Strategic Laydown plan is referenced in the 2012  
 Environmental Assessment for the Prowler to Growler transition, but it is not available  
 online or publicly. Please provide verification of this review. I've included a referenced

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.b. Invisible Costs
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.l. Points of Interest
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones

paper [REDACTED] on the why single siting risks OPSEC and readiness - my points are summarized here: a. The proposal plans for all Growlers to be based on an Island served by a bridge and two ferries. The bridge is historic, on the STRAHNET highway network, deemed critical by the Federal Highway Administration. It's on the seismic retrofit list by the Washington State Department of Transportation. It could easily be taken out by 100-500 lbs. of TNT per the American Association of State Highway and Transportation Officials (AASHTO). Deception Pass Bridge carries all the water for NASWI and the Town and is the only 24/7 vehicle access to the Island. b. Seattle area ferries are considered the #1 maritime terrorism risk according to the FBI (along with Gulf Coast oil tankers). Even with increased security by Washington State Ferries, it is easily possible to take out a ferry with explosives or through a collision en route. Naval Postgraduate Schools' own studies show that these ferries are extremely vulnerable to terrorist attack. c. All the jet EW presence is in the Pacific Northwest, and far from those Gulf Coast Tankers, and the East Coast (think White House). What kind of electronic warfare could be effective on attack if Growlers are hours away? Per [REDACTED], USMC, Ret. – more than half of the Army, tactical Air Force and Special Forces are on the East Coast. The F-35 is not ready yet to help them and everyone is depending on the Growler. d. For reasons of security and readiness, the Navy needs to consider dual-siting the Growler. This is consistent with the Technical Joint Cross Service Group (TJCSG) guiding principle to “maintain competition of ideas by retaining at least two geographically separated sites, each of which would have similar combination of technologies and functions. This will also provide continuity of operations in the event of unexpected disruption.”

6. Accident Potential Zones (APZs) a. Accident Potential Zones are confusing and inadequate for review The information for APZs is contradictory and unclear. The DEIS states that APZs will be required when operations exceed 5,000 annually and yet the current operations are at 6,100 annually (per the no action alternative). I realize APZs will be formalized with a new Air Installation Compatibility Use Zones (AICUZ) study to be performed after the EIS is finalized and the action is chosen by the Secretary of the Navy. However, the DEIS only shows conceptual APZs for Scenarios A and B, but not for the no action alternative or for Scenario C. This leaves it unclear as to which scenarios will lead to the development of APZs. From the definition of exceeding >5,000 operations annually, it would seem that APZs are going to be required for all scenarios and alternatives, even the no action alternative. APZs need to be cleared up in the final EIS. The APZs drawn need to be actual, not conceptual, and the public needs to have a 60-day comment period to respond to them, as APZs significantly restrict land use. b. Conceptual APZs drawn are incompatible with current land uses. APZ-1 for Scenarios A and B is incompatible with several long-standing community infrastructures, as well as housing – included, but not limited to, the following: i. Island County Transfer Station (Solid Waste) ii. Island Transit Headquarters (bus system) iii. Ryan's House for Youth – Teen homeless shelter iv. Central Whidbey Island Fire and Rescue Race Road Station v. Whidbey Animals' Improvement Foundation – animal shelter vi. Rhododendron Park Campground vii. Central Whidbey Gun Club viii. Admiral's Cove Neighborhood – Planned residential development ix. A number of home-based businesses x. A number of vacation rentals, essential to Island economy (AirBnb and VRBO) Chapter 17.03.180 of the Island County Code discusses APZs and is available here: <https://www.islandcounty.net/code/documents/ICC17.03.pdf> . Note that Island County code is significantly less restrictive than the Department of Defense Instruction 4165.67 for Air Installations Compatible Use Zones. What is not listed in the DEIS is how these

current incompatibilities will be resolved. Will these structures require re-siting or closure? Can APZs be adjusted? Who will pay to ensure compatibility of current land uses in APZs? And how will landowners be compensated for loss of value if their land becomes placed in the APZ? How will the Navy work with the county and state, and does the public have a say in this? This is why APZs need to be crystal clear – their location, the scenarios under which they are required, and the consequences of incompatible land uses within APZs. 7. Outlying Field Coupeville is substandard for any Hornet airframe, per the Navy's own DEIS for West Coast siting of the F/A-18. The 1998 Draft EIS for "US Pacific Fleet F/A 18 E/F Aircraft for Development of Facilities to Support Basing on the West Coast of the United States, Possible Site Installations are (1) Lemoore Naval Air Station and (2) El Centro Naval Air Facility, Fresno County" declares that a secondary runway must be 6,500 feet in length. OLF Coupeville is 5,400 feet in length. 8. The DEIS considers both detachment training and regional airfields as alternatives but dismisses these without analysis. All 9 alternatives studied in the DEIS call for 100% of Growler training to be conducted on Whidbey Island. Below is a growing list of sites that could be used for some Growler training, which should be considered in the final EIS to mitigate the "significant impact" of the proposed action, especially at the OLF. Aircraft can be sited at NASWI, as called for in the proposed action, but flown at any number of alternative locations. Below are options requiring analysis. Sites already mentioned in the DEIS are indicated by an asterisk. Detachment training from NASWI is already occurring, or has occurred, at some of these bases. Detachment from NASWI has already occurred at NAS Jacksonville, per Navy Press Release, Story Number: NNS101208-18 Release Date: 12/8/2010. a. Detachment training alternatives which should be analyzed in the DEIS for NASWI: i. NAS Lemoore (CA)\* ii. NAF El Centro (CA)\* iii. NAWS China Lake (CA)\* iv. NAS Jacksonville (FL) v. NAS Oceana (VA)\* vi. MCAS Cherry Point (NC)\* vii. NAS Meridian (AL) viii. NAS Fallon (NV) ix. Mountain Home AFB (ID) x. NAS Kingsville (TX) xi. NAS Corpus Christi (TX) b. Regional Airfield options for FCLP practice: i. Joint Base Lewis-McCord (Tacoma)\* ii. Grey Army Airfield (Tacoma)\* iii. Grant County (Larsen AFB) (Moses Lake) iv. Snohomish County (Paine Field) (Everett)\* v. Bremerton National (Bremerton)\* vi. Skagit Regional (Burlington)\* (only 100' width) vii. Bellingham International\* All of the above, other than Grant County, have been disqualified using selected criteria in DEIS Appendix, Section H, for one or more reasons. However, using the same DEIS criteria Ault Field would have also been disqualified for FCLPs, having failed criteria #6 and #8. The Navy needs to use consistent criteria for runway evaluation for detachments and regional airfield options – to do otherwise is disingenuous. 9. The Navy has 42 more Growlers on order and these are not mentioned in the DEIS. Per the Selected Acquisition Report of the Department of Defense for FY 2017, the Navy plans to procure another 42 Growlers. Current fleet size is 82. Plus the 36 planned in the DEIS makes 118 aircraft. Adding another 42 (without designating a location) one assumes they would end up at NASWI as there is no other base. That would make 160 at NASWI, less 7 forward deployed to Atsugi, Japan. 153 Growlers is almost double the current fleet size. I'd like to hope the Navy isn't being disingenuous here, but segmenting up these proposals does not represent impact fairly to the community. The additional 42 Growlers on order need to be included in the EIS as well as where those Growlers will be based. 10. Adding 371 to 664 new households to the Island will cause a crisis in housing availability and affordability. The alternatives proposed in the DEIS would bring 371 to 664 new personnel to the Island, requiring exactly that much housing. Current rental market availability in Coupeville is < 1%. The Island and its environs likely cannot absorb

that many more personnel without causing a housing crisis and would likely jeopardize what little affordable housing we have. Navy expansion causing displacement of local residents is not acceptable. The baseline year for comparison was one of the most available rental markets in many years. The EIS needs to look at current housing data for 2016 and make its forecasts based on that data. 11. Coupeville schools and WhidbeyHealth Medical Center were not included properly in noise modeling. Coupeville Middle and High Schools were not adequately noise modeled in the DEIS, and WhidbeyHealth Medical Center was not modeled at all. Complete noise modeling for all 3 Coupeville schools, considering both indoor and outdoor activities, needs to be undertaken, especially since there is a growing Farm to School Program (Coupeville Farm to School) that relies on outdoor education of all grade levels. Complete noise modeling of WhidbeyHealth Medical Center needs to be included as its expansion has it closer to its reference point of Coupeville Elementary School. 12. The DEIS does not include information on water contamination with PFAS compounds. Water quality issues were known months before issuance of the DEIS. PFAS contamination information, and risk for further contamination because of the Navy's continued use of PFAS firefighting foam, needs to be included in the EIS. 13. The DEIS does a poor job of investigating other sites for the new Growlers. The DEIS spends less than two pages discussing other sites for the new Growlers. A more robust analysis of alternate sites needs to be undertaken, to mitigate environmental impact as well as to address the operational security risks and military readiness issues listed above. Additionally, this was the fourth largest request in the public scoping of the EIS, and only addressed in 2 of almost 1500 pages. Site analysis criteria again need to be consistent. It is disingenuous to exclude other facilities for criteria that the current facility does not meet. The Navy should consider underutilized assets like NAS Kingsville, Texas – remotely populated, with an updated outlying field, and close to Gulf Coast oil tankers. MCAS Cherry Point, NC, also deserves inclusion and serious analysis as it hosted EA-6B Prowlers for the Marine Corps and retains some of that infrastructure. I appreciate the opportunity to provide comments. I hope the Navy will make an EIS that is inclusive, accurately addresses impact and takes a serious look at mitigations, especially those that allow new Growlers to be sited elsewhere. Very truly yours, [REDACTED], MA/MS, RD, CD, CSO Clinical Dietitian Retired Navy wife of a Prowler Pilot – VAQ-134, VAQ-130, VAQ-133 Resident of Whidbey Island 1992-2004, 2009-present Encl.: "Why Single Siting the Navy's Electronic Warfare Asset Risks Operational Security and Military Readiness" by Lori B. Taylor, 2/23/17 Why Single Siting the Navy's Electronic Warfare Asset Risks Operational Security and Military Readiness Siting new Growlers elsewhere presents an opportunity to remedy both © Lori B. Taylor, February 23, 2017 Few people know it, but on an idyllic Island in the Pacific Northwest, the US military houses its entire fleet of electronic warfare jet aircraft. Accessible only by bridge or ferry, this concentration of defense technology at a vulnerable location poses a severe operational security risk. Even more concerning, the Department of Defense is planning to double the amount of aircraft based in this location, seemingly without consideration of security risk. Operationally, economically and environmentally it doesn't make sense. How did this happen? What should be done? The Unique Concentration of Electronic Warfare Jets The US Navy relies on the E/A-18G Growler as its main asset for airborne electronic warfare (EW). The Growler is a fixed-wing jet aircraft used to monitor and suppress surface-to-air missile radar as well as other ground-based electronic signals in times of war. It can be land-based or carrier-based. Growlers are a considered a high-value unit, and two fly with each US

military mission over enemy territory, accompanied by either Navy or Air Force fighter/bomber aircraft. The Growler replaced the Navy's prior EW aircraft, the E/A-6B Prowler when it retired in 2015. The Growlers, their crews, maintenance equipment, personnel and training facilities are all home-ported in one geographic location, NAS Whidbey Island, where the Navy has single sited its electronic warfare jets for 40 years. (One squadron of Growlers is forward deployed to Atsugi, Japan. ) This single siting of bases is unique to the Growler, with all other Navy aircraft having at least two bases in the Continental US. It's never been clear why the Navy has concentrated its EW jet aircraft in one geographic location. Single siting of any military function is a violation of the Technical Joint Cross Service Group (TJCSG) guidelines. TJCSG was formed in the wake of the Base Realignment and Closure Act of 1990 (BRAC) to make recommendations to optimize defense structure for cost and strategy. One of the TJCSG's two guiding principles was "Maintain competition of ideas by retaining at least two geographically separated sites, each of which would have similar combination of technologies and functions. This will also provide continuity of operations in the event of unexpected disruption." Perhaps Navy EW single siting was allowed because historically, other branches of the US Armed Forces maintained electronic warfare jet aircraft. At the time of BRAC, the US Air Force flew the EF-111 Raven and the US Marine Corps flew the E/A-6B Prowler. However, in 1998 the Air Force retired the EF-111 and it was not replaced. Its electronic warfare duties were transferred to the Navy, which then developed land-based ("expeditionary") squadrons to accommodate. The Marine Corps is now in the process of decommissioning its E/A-6B Prowlers, which will retire at the end of FY 2016. The Marines plan to utilize the F-35 Joint Strike Fighter for some of their electronic warfare functions , but the aircraft is not fleet-ready. The F-35 reached initial operating capability in August 2016, but has since been grounded due to electrical problems. This leaves the Navy in the unique position of holding the entire US military electronic warfare jet aviation asset of 82 Growlers in one vulnerable location. And it has plans to increase this concentration of aircraft. Per its 2016 Draft Environmental Impact Statement (DEIS), the Navy plans to add 35-36 more aircraft to NAS Whidbey, bringing the total number of Growlers to 118. This operational increase is due to a change in the strategy of Growler use, with the goal to dedicate three aircraft per mission instead of two , making the aircraft an even more valuable asset to all forces. In the same DEIS, the Navy maintains this single siting decision is reviewed annually under the Chief of Naval Operations' Strategic Laydown and Dispersal plan, "...and is consistent with Navy aviation policy to maximize efficiency of operations by co-locating operational squadrons with support functions, training ranges, and airfields." The reasons cited for the concentration of Growlers are operational synergy, proximity to training regions and airspace and efficient use of current infrastructure. Upon review of the references in the DEIS however, there is no citation of the Strategic Laydown and Dispersal Plan and no verification of the Navy's claim of review. The Navy's 2012 Environmental Assessment for the Prowler to Growler transition references the 2008 version of the plan as a rationale to homeport the expeditionary squadrons at Whidbey. Unfortunately, neither the 2008 nor 2011 versions of the Strategic Laydown and Dispersal Plan are available publicly. Operational review of this single siting decision therefore cannot be verified. The Navy shows no signs of stopping its concentration of EW assets on Whidbey Island even after its proposal in the current DEIS. Per the Selected Acquisition Report from the Department of Defense, the Navy plans to procure another 42 Growlers, bringing the total number of Growlers to 160 aircraft, nearly double the current fleet size. The Navy has not

publicly documented where these additional 42 Growlers will be assigned. Less the 7 aircraft forward deployed to Japan that leaves 153 aircraft that will likely be stationed at NAS Whidbey Island. This means that 95% of the entire US fleet of electronic warfare jets is based a coastal island served only by a bridge and two ferries. Whidbey Island – Idyllic and Extremely Vulnerable Whidbey Island lies in the northern part of Puget Sound in Washington State, 30 miles northwest of Seattle. The Island is home to about 60,000 residents and is part of Island County. Oak Harbor is the largest town on the Island, and has been home to Naval Air Station Whidbey Island since 1942. Whidbey Island is accessible from the North by the Deception Pass Bridge, which was built in 1935 by the Civilian Conservation Corps, and is on the National Register of Historic Places. The two-lane bridge encompasses two spans and is a total of 1,487 feet long, 180 feet above the water, with an average daily traffic of between 17,000-20,000 vehicles. , As Whidbey Island is served by an EPA-designated sole-source aquifer, the Deception Pass Bridge also brings in a 24-inch water line that serves NAS Whidbey and the city of Oak Harbor. The Deception Pass Bridge lies on State Highway 20 and joins Whidbey Island to Fidalgo Island, its neighbor to the North. Fidalgo Island is then connected to the mainland by another bridge near LaConner, Washington. The only remaining way to access Whidbey Island is by its two ferry routes – from Port Townsend on the Peninsula to Coupeville in Central Whidbey, and from Mukilteo on the mainland to Clinton on South Whidbey. These ferries are operated by the Washington State Ferry System (WSF), which is the largest in the nation. In 2016, the Clinton to Mukilteo route carried just over 4 million passengers, and 2.2 million vehicles, while the Coupeville to Port Townsend route carried 372,000 vehicles and 819,000 passengers. The ferries operate from 14 to 20 hours per day. Outside these two ferry routes and the Deception Pass Bridge, there are no other ways for vehicles to access the Island. These limited forms of access can serve as a choke point to limit egress from the Island in an emergency or prevent access of needed commodities or first responders. The 2007 Hazard Identification and Vulnerability Assessment from Island County confirms that Whidbey Island is “...vulnerable to several types of transportation emergencies including blocked bridges and interrupted ferry service.” Studying them in depth exposes just how vulnerable. Deception Pass – A Critical Bridge Given the limited accessibility of the Island, it’s no surprise that the Deception Pass Bridge meets the Federal Highway Administration’s criteria of a nationally critical bridge according to a paper from the American Association of State Highway and Transportation Officials (AASHTO) titled “National Needs Assessment for Ensuring Transportation Infrastructure Security.” The Deception Pass Bridge is a critical bridge due to the following criteria - • Casualty risk – its bridge span significantly greater than 50 feet • Economic risk – it is located on the Department of Defense-defined Strategic Highway Network (STRAHNET), and the bridge’s nearest detour is greater than 5 miles away. • Military support function – due to bridge length and STRAHNET status • Emergency relief function – it is the major evacuation route for the Island • National recognition – it is on National Register of Historic Places • Collateral damage exposure – as it carries utilities (specifically water) Per the National Needs Assessment cited above, the greatest risk to the bridge is an explosive attack scenario. The report goes on to say; “bridges and tunnels cannot be fully protected against significant disruption to roadway decks from even modest explosive quantities.” In its analysis the AASHTO notes that as little as 100 to 500 pounds of TNT (placed by hand on members, or driving in a moving van across the bridge) could easily make the bridge non-operational. It is unknown whether any security measures have been taken to reduce risks of a terrorist attack to

the Deception Pass Bridge, or what measures are possible on this historic bridge on a public highway. Additionally, as NAS Whidbey Island is within 15 miles of five earthquake fault lines, Deception Pass Bridge is at high risk of earthquake damage. The bridge remains on the unfunded Washington State list for seismic retrofitting. A major earthquake that damaged the bridge would cripple both the base and the Island for weeks to months. Whether the risk is from terrorism or natural disaster, Deception Pass Bridge remains a significant point of vulnerability for NAS Whidbey Island, as it is the only method of entrance or egress available 24 hours per day. Washington State Ferries – Most Likely Terrorism Targets Ferries, especially ones that carry vehicles, are one of the most vulnerable modes of transport for terrorist attacks. According to the State of New Jersey Office of Homeland Security and Preparedness (NJOHSP) 2016 intelligence briefing, "...ferries remain susceptible to terrorist attacks because they transport large volumes of people, have limited security, and offer minimal escape options during incidents." After the September 11, 2001 terrorist attacks, the US Coast Guard was directed to increase general marine security by the Maritime Transportation Security Act of 2002. Further security measures were implemented by the Washington State Ferry system in 2004, after the FBI reported 157 suspicious incidents since 2001, with 19 of them highly likely to involve terrorist surveillance. WSF increased security safeguards to include K-9 screening of 15 percent of cars and 25 percent of box trucks, vans and larger vehicles as well as increased use of sea marshals, aircraft surveillance and armed US Coast Guard fast boats for ferry protection. Even with security measures in place, the Washington State Ferry system remained highly vulnerable according to analysts. In 2004, a team of Navy and Marines from the Naval Postgraduate School in Monterey, California conducted a "red team" analysis on the vulnerabilities of domestic port security on the West coast. Using a red team approach, military officers strategized according to Al-Qaeda directives about how to best infiltrate and disable ports. They visited Seattle and found security checks to be cursory and were able to easily gain access to restricted areas. The Seattle team concluded the most effective terror strategy would be to detonate explosives simultaneously on five WSF ferries. Their results were unsettling enough that they presented them to local law enforcement, officials of the ferry system, and a national meeting of US mayors in late 2004 before publication of their report. The FBI went a step further in its risk assessment. In its 2006 report "The Federal Bureau of Investigation's Efforts to Protect The Nation's Seaports," the Department of Justice's Inspector General stated, "the FBI believes that ferries in the Seattle area and fuel tankers in the Gulf Coast Region appear to be the most likely targets of maritime terrorism." The Government Accounting Office (GAO) acknowledged the vulnerability of ferries, noting that the risk of such events was increasing. In its 2010 report "Maritime Security: Ferry Security Measures Have Been Implemented, but Evaluating Existing Studies Could Enhance Further Security," the GAO reported that "in April 2010, Coast Guard officials stated that the relative risk to ferries is increasing, as evidenced by attacks against land-based mass transit and other targets overseas." However, the report also notes: "the Coast Guard may be missing opportunities to enhance ferry security," as the Guard had not evaluated or acted on all findings of five agency-contracted studies from 2005-2006. There is ample agreement from a number of federal agencies and the Coast Guard that ferries are highly vulnerable to terrorist attacks, with Seattle area ferries being one of the two most likely targets in the United States. Agencies continue to implement security measures and train for the worst. The Coast Guard, with local law enforcement conducted SWAT-style drills on Seattle ferries in 2012 that were covered by the local

press. WSF implemented a Coast Guard approved security plan in 2013. However, given that ferries travel on water, there is no way all risks can be mitigated. A humorous video of a sleepy (but fortunate) sailboat captain on autopilot being surprised by a ferry collision prompted a few chuckles from Seattle locals in late 2016. Taking the red team approach however, it would not be difficult to imagine damaging a ferry with a boat full of explosives in the same manner. The dependence on vulnerable ferry traffic to NAS Whidbey Island represents a security risk the US military cannot afford to take. Given Operational Security Risks, Does Single Siting Make Operational Sense? As stated before, having all of one type of jet aircraft in one location is unique to the Growler in the US Navy, and due to retirement of Air Force and Marine Corps EW jets, the Navy now holds all of the US active EW jet aircraft. Is there a benefit to this? The answer from at least one service seems to be no. The Marine Corps predict a three- to five-year gap in expeditionary warfare capability as they phase out the E/A-6B Prowler, and await the deployment of the F-35. This leaves the USMC dependent on the Navy to provide EW assets to the Marines, according to an editorial on the website of the US Naval Institute (USNI). The author, Col. H. Wayne Whitten, USMC Retired, states that home porting all E/A-18Gs at NAS Whidbey Island "raises operational readiness issues.... It's noble in intent but highly questionable from a roles and mission standpoint that all land-based EW aircraft will be owned by the Navy, the service with the least natural ties and expertise in ground combat operations." The USNI article also describes that single-siting all EW assets in the Pacific Northwest makes it difficult to provide proper cross-training, as "over half of the Army, Marine Corps, SOF and tactical Air Force units are in the eastern U.S. Additionally, DoD has a sizable investment in East Coast ranges that continue to be under-utilized for EW training." Siting new expeditionary Growlers on the East Coast would establish a geographic balance that is "consistent with long-term Navy policy." Col. Whitten recommends the Pentagon take a look at regional benefits and site new Growlers at Marine Corps Air Station Cherry Point, and not NAS Whidbey Island. "Ironically, the increase in aircraft loading at NAS Whidbey Island has created an environmental impact even as the draw down in EA-6Bs at Marine Corps Air Station Cherry Point, NC, and delays in the F-35B deliveries are causing serious economic concerns. One would think North Carolina officials would see now is the time to put aside fears that questioning the EA-6B drawdown would somehow be viewed as threatening the F-35B. In fact, they should be making the case to homeport the Navy expeditionary EA-18Gs at MCAS Cherry Point." In 2015, the US Air Force stated that it also planned to use the F-35 for its electronic warfare, rather than new Growlers. It appears that not only the Marines will have to depend on the Navy until the F-35 is fleet-ready. New Growlers Need a Second Site Single siting the entire electronic warfare jet arsenal on the West Coast, with one service, on an island served by a vulnerable bridge and ferries is a major operational security risk. This geographic location also reduces operational readiness in a warfare strategy that right now has only one active aircraft that all services depend upon. The delivery of 36 new Growler aircraft (plus 42 more on order) provides the Navy with a prime opportunity to site its new EW assets at a more operationally beneficial location. This would not only reduce the environmental impact at NAS Whidbey (whose outlying field does not meet current standards for the aircraft), but would enhance operational security and readiness, and provide another community the economic benefit of a modest group of vital aircraft. MCAS Cherry Point, North Carolina is a viable option as it has EW infrastructure from its time hosting the E/A-6B Prowler. There are also other options like Naval Air Station Kingsville, Texas, which has a low population density, updated outlying



field, proximity to the East Coast and ready access to the Gulf Coast. Given that the FBI considers Gulf Coast oil tankers to also be a prime maritime security risk, having EW aircraft close to the Gulf Coast would make an immense difference in response time to a terrorist attack. Creative solutions can and must be found to safeguard the Growler, which is a vital asset to US military defense. Loss of jet electronic warfare capability would paralyze all US (and Coalition) airborne missions. Redundancy is key in protecting this vital resource and is practiced with every other jet aircraft the Navy owns. Finding another base for new Growlers will be costly, but not nearly as costly as losing the entire fleet and infrastructure to a terrorist attack or natural disaster. Endnotes do not show in this format. They are instead listed as references.

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February 24, 2017

EA-18G Growler EIS Project Manager  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard  
 Norfolk, VA 23508  
 Attn: Code EV21/SS

To Whom It May Concern:

Please find enclosed my comments for the US Navy Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex.

While I very much appreciate the time and effort that went into the preparation of the Navy's DEIS, I do not feel it completely represents the impact of increasing Growler operations, especially to the Central Whidbey Island community.

Therefore, I offer the following comments.

**1. The Final EIS needs a public comment period of 60 days.**

Not having public comment after the draft period is unacceptable, especially when a preferred alternative was not chosen, and when only conceptual Accident Potential Zones (APZs) are drawn.

**2. Increasing operations at OLF Coupeville will heavily impact the economy of Coupeville and Central Whidbey, which are dependent upon tourism and recreation.**

People come to Coupeville to visit the second oldest town in Washington, hike Ebey's Landing and visit the National Historic Reserve, folks get married on our farms here and they come from far and wide and to have farm-to-table outdoor dinners. All these activities support our local economy.

Increases in flight noise are directly incompatible with the economy of Central Whidbey. If APZs are to be drawn, they will further hamper economic activity in the area by prohibiting many small and home-based businesses as well.

1.a. Thank You  
 1.e. Risk of Terrorist Attack  
 11.d. Per- and Polyfluoroalkyl Substances  
 12.b. Invisible Costs  
 12.h. Tourism  
 12.i. Housing Access and Affordability  
 12.j. Property Values  
 14.a. Transportation Impacts  
 14.d. Bridges and Ferries  
 15.c. Groundwater  
 16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)  
 2.a. Purpose and Need  
 2.b. Scope of the Environmental Impact Statement and Analysis Conducted  
 2.d. Program of Record for Buying Growler Aircraft  
 2.e. Public Involvement Process  
 2.h. Next Steps  
 2.i. Proposed Action  
 2.n. Alternatives Considered But Eliminated  
 3.a. Aircraft Operations  
 4.l. Points of Interest  
 4.r. Nonauditory Health Effects  
 5.a. Accident Potential Zones  
 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

3. **Growler noise is already poorly controlled, and has lead to a decrease in property values. Adding more Growlers, without managing noise properly, is not acceptable.**

Since the Prowler to Growler transition, flights have exceeded the existing EIS and noise has been poorly managed. Per economist Michael Shuman's report, "*Invisible Costs: The \$122 Million Price Tag for The Naval Air Station Whidbey Island*," real estate values have plummeted \$9.5 million since the Growler transition. Adding more planes would worsen this decline.

Mr. Shuman's report can be found here:

[https://sustainableeconomycollaborative.files.wordpress.com/2017/02/invisible-costs-final\\_2\\_20.pdf](https://sustainableeconomycollaborative.files.wordpress.com/2017/02/invisible-costs-final_2_20.pdf)

4. **Current levels of jet noise at the NASWI complex are considered a health hazard by the Washington State Department of Health.**

Per the WSDOH report of February, 2017: "...noise levels similar to those reported from NAS Whidbey Island Complex described in all recent reports pose a threat to public health."

Please see the report here:

<https://www.islandcountywa.gov/Health/PublishingImages/Pages/News-from-Health-Officer/DOH%20Noise%20Review.docx>

An increase in operations only increases the noise and the threat to public health.

5. **Single-siting the Growler at NAS Whidbey Island is a risk to operational security and military readiness.**

Given the Navy holds all the electronic warfare jet assets for the entire US military, having all the Growlers here (plus the 35-36 the Navy are proposing to add), is an OPSEC risk due to terrorism and natural disasters.

The DEIS states that the single siting decision is reviewed annually by the Chief of Naval Operations' "Strategic Laydown and Dispersal Plan," but this is not referenced in the DEIS, nor available online. The 2008 Strategic Laydown plan is referenced in the 2012 Environmental Assessment for the Prowler to Growler transition, but it is not available online or publicly. Please provide verification of this review.

I've included a referenced paper I authored on the why single siting risks OPSEC and readiness - my points are summarized here:

- a. The proposal plans for all Growlers to be based on an Island served by a bridge and two ferries. The bridge is historic, on the STRAHNET highway network, deemed critical by the Federal Highway Administration. It's on the seismic retrofit list by the Washington State Department of Transportation. It could easily be taken out by 100-500 lbs. of TNT per the American Association of State Highway and Transportation Officials (AASHTO). Deception Pass Bridge carries all the water for NASWI and the Town and is the only 24/7

vehicle access to the Island.

- b. Seattle area ferries are considered the #1 maritime terrorism risk according to the FBI (along with Gulf Coast oil tankers). Even with increased security by Washington State Ferries, it is easily possible to take out a ferry with explosives or through a collision en route. Naval Postgraduate Schools' own studies show that these ferries are extremely vulnerable to terrorist attack.
- c. All the jet EW presence is in the Pacific Northwest, and far from those Gulf Coast Tankers, and the East Coast (think White House). What kind of electronic warfare could be effective on attack if Growlers are hours away? Per Col Wayne Whitten, USMC, Ret. – more than half of the Army, tactical Air Force and Special Forces are on the East Coast. The F-35 is not ready yet to help them and everyone is depending on the Growler.
- d. For reasons of security and readiness, the Navy needs to consider dual-siting the Growler. This is consistent with the Technical Joint Cross Service Group (TJCSG) guiding principle to “maintain competition of ideas by retaining at least two geographically separated sites, each of which would have similar combination of technologies and functions. This will also provide continuity of operations in the event of unexpected disruption.”

## 6. Accident Potential Zones (APZs)

- a. Accident Potential Zones are confusing and inadequate for review

The information for APZs is contradictory and unclear. The DEIS states that APZs will be required when operations exceed 5,000 annually and yet the current operations are at 6,100 annually (per the no action alternative).

I realize APZs will be formalized with a new Air Installation Compatibility Use Zones (AICUZ) study to be performed after the EIS is finalized and the action is chosen by the Secretary of the Navy. However, the DEIS only shows conceptual APZs for Scenarios A and B, but not for the no action alternative or for Scenario C.

This leaves it unclear as to which scenarios will lead to the development of APZs. From the definition of exceeding >5,000 operations annually, it would seem that APZs are going to be required for all scenarios and alternatives, even the no action alternative.

APZs need to be cleared up in the final EIS. The APZs drawn need to be actual, not conceptual, and the public needs to have a 60-day comment period to respond to them, as APZs significantly restrict land use.

- b. Conceptual APZs drawn are incompatible with current land uses.

APZ-1 for Scenarios A and B is incompatible with several long-standing community infrastructures, as well as housing – included, but not limited to, the following:



- i. Island County Transfer Station (Solid Waste)
- ii. Island Transit Headquarters (bus system)
- iii. Ryan's House for Youth – Teen homeless shelter
- iv. Central Whidbey Island Fire and Rescue Race Road Station
- v. Whidbey Animals' Improvement Foundation – animal shelter
- vi. Rhododendron Park Campground
- vii. Central Whidbey Gun Club
- viii. Admiral's Cove Neighborhood – Planned residential development
- ix. A number of home-based businesses
- x. A number of vacation rentals, essential to Island economy (AirBnb and VRBO)

Chapter 17.03.180 of the Island County Code discusses APZs and is available here: <https://www.islandcounty.net/code/documents/ICC17.03.pdf>. Note that Island County code is significantly less restrictive than the Department of Defense Instruction 4165.67 for Air Installations Compatible Use Zones.

What is not listed in the DEIS is how these current incompatibilities will be resolved. Will these structures require re-siting or closure? Can APZs be adjusted? Who will pay to ensure compatibility of current land uses in APZs? And how will landowners be compensated for loss of value if their land becomes placed in the APZ? How will the Navy work with the county and state, and does the public have a say in this?

This is why APZs need to be crystal clear – their location, the scenarios under which they are required, and the consequences of incompatible land uses with in APZs.

**7. Outlying Field Coupeville is substandard for any Hornet airframe, per the Navy's own DEIS for West Coast siting of the F/A-18.**

The 1998 Draft EIS for "US Pacific Fleet F/A 18 E/F Aircraft for Development of Facilities to Support Basing on the West Coast of the United States, Possible Site Installations are (1) Lemoore Naval Air Station and (2) El Centro Naval Air Facility, Fresno County" declares that a secondary runway must be 6,500 feet in length. OLF Coupeville is 5,400 feet in length.

**8. The DEIS considers both detachment training and regional airfields as alternatives but dismisses these without analysis.**

All 9 alternatives studied in the DEIS call for 100% of Growler training to be conducted on Whidbey Island. Below is a growing list of sites that could be used for some Growler training, which should be considered in the final EIS to mitigate the "significant impact" of the proposed action, especially at the OLF. Aircraft can be sited at NASWI, as called for in the proposed action, but flown at any number of alternative locations.

Below are options requiring analysis. Sites already mentioned in the DEIS are indicated by an asterisk. Detachment training from NASWI is already occurring, or has occurred, at some of these bases.

Detachment from NASWI has already occurred at NAS Jacksonville, per Navy Press Release, Story Number: NNS101208-18 Release Date: 12/8/2010.

- a. Detachment training alternatives which should be analyzed in the DEIS for NASWI:
  - i. NAS Lemoore (CA)\*
  - ii. NAF El Centro (CA)\*
  - iii. NAWS China Lake (CA)\*
  - iv. NAS Jacksonville (FL)
  - v. NAS Oceana (VA)\*
  - vi. MCAS Cherry Point (NC)\*
  - vii. NAS Meridian (AL)
  - viii. NAS Fallon (NV)
  - ix. Mountain Home AFB (ID)
  - x. NAS Kingsville (TX)
  - xi. NAS Corpus Christi (TX)
  
- b. Regional Airfield options for FCLP practice:
  - i. Joint Base Lewis-McCord (Tacoma)\*
  - ii. Grey Army Airfield (Tacoma)\*
  - iii. Grant County (Larsen AFB) (Moses Lake)
  - iv. Snohomish County (Paine Field) (Everett)\*
  - v. Bremerton National (Bremerton)\*
  - vi. Skagit Regional (Burlington)\* (only 100' width)
  - vii. Bellingham International\*

All of the above, other than Grant County, have been disqualified using selected criteria in DEIS Appendix, Section H, for one or more reasons. However, using the same DEIS criteria Ault Field would have also been disqualified for FCLPs, having failed criteria #6 and #8.

The Navy needs to use consistent criteria for runway evaluation for detachments and regional airfield options – to do otherwise is disingenuous.

**9. The Navy has 42 more Growlers on order and these are not mentioned in the DEIS.**

Per the Selected Acquisition Report of the Department of Defense for FY 2017, the Navy plans to procure another 42 Growlers. Current fleet size is 82. Plus the 36 planned in the DEIS makes 118 aircraft. Adding another 42 (without designating a location) one assumes they would end up at NASWI as there is no other base. That would make 160 at NASWI, less 7 forward deployed to Atsugi, Japan. 153 Growlers is almost double the current fleet size.

I'd like to hope the Navy isn't being disingenuous here, but segmenting up these proposals does not represent impact fairly to the community. The additional 42 Growlers on order need to be included in the EIS as well as where those Growlers will be based.

**10. Adding 371 to 664 new households to the Island will cause a crisis in housing availability and affordability.**

The alternatives proposed in the DEIS would bring 371 to 664 new personnel to the Island, requiring exactly that much housing. Current rental market availability in Coupeville is < 1%. The Island and its environs likely cannot absorb that many more personnel without causing a housing crisis and would likely jeopardize what little affordable housing we have. Navy expansion causing displacement of local residents is not acceptable.

The baseline year for comparison was one of the most available rental markets in many years. The EIS needs to look at current housing data for 2016 and make its forecasts based on that data.

**11. Coupeville schools and WhidbeyHealth Medical Center were not included properly in noise modeling.**

Coupeville Middle and High Schools were not adequately noise modeled in the DEIS, and WhidbeyHealth Medical Center was not modeled at all.

Complete noise modeling for all 3 Coupeville schools, considering both indoor and outdoor activities, needs to be undertaken, especially since there is a growing Farm to School Program (Coupeville Farm to School) that relies on outdoor education of all grade levels.

Complete noise modeling of WhidbeyHealth Medical Center needs to be included as its expansion has it closer to its reference point of Coupeville Elementary School.

**12. The DEIS does not include information on water contamination with PFAS compounds.**

Water quality issues were known months before issuance of the DEIS. PFAS contamination information, and risk for further contamination because of the Navy's continued use of PFAS firefighting foam, needs to be included in the EIS.

**13. The DEIS does a poor job of investigating other sites for the new Growlers.**

The DEIS spends less than two pages discussing other sites for the new Growlers. A more robust analysis of alternate sites needs to be undertaken, to mitigate environmental impact as well as to address the operational security risks and military readiness issues listed above. Additionally, this was the fourth largest request in the public scoping of the EIS, and only addressed in 2 of almost 1500 pages.

Site analysis criteria again need to be consistent. It is disingenuous to exclude other facilities for criteria that the current facility does not meet.

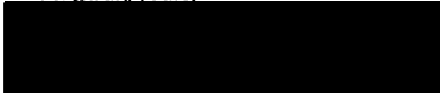
The Navy should consider underutilized assets like NAS Kingsville, Texas – remotely populated, with an updated outlying field, and close to Gulf Coast oil tankers. MCAS Cherry Point, NC, also




deserves inclusion and serious analysis as it hosted EA-6B Prowlers for the Marine Corps and retains some of that infrastructure.

I appreciate the opportunity to provide comments. I hope the Navy will make an EIS that is inclusive, accurately addresses impact and takes a serious look at mitigations, especially those that allow new Growlers to be sited elsewhere.

Very truly yours,



Clinical Dietitian  
Retired Navy wife of a Prowler Pilot – VAQ-134, VAQ-130, VAQ-133  
Resident of Whidbey Island 1992-2004, 2009-present

Encl.: "Why Single Siting the Navy's Electronic Warfare Asset Risks Operational Security and Military Readiness" by , 2/23/17

**Why Single Siting the Navy's Electronic Warfare Asset  
Risks Operational Security and Military Readiness**

*Siting new Growlers elsewhere presents an opportunity to remedy both*

© [REDACTED], February 23, 2017

Few people know it, but on an idyllic Island in the Pacific Northwest, the US military houses its entire fleet of electronic warfare jet aircraft. Accessible only by bridge or ferry, this concentration of defense technology at a vulnerable location poses a severe operational security risk. Even more concerning, the Department of Defense is planning to double the amount of aircraft based in this location, seemingly without consideration of security risk. Operationally, economically and environmentally it doesn't make sense.

How did this happen? What should be done?

**The Unique Concentration of Electronic Warfare Jets**

The US Navy relies on the E/A-18G Growler as its main asset for airborne electronic warfare (EW). The Growler is a fixed-wing jet aircraft used to monitor and suppress surface-to-air missile radar as well as other ground-based electronic signals in times of war. It can be land-based or carrier-based.

Growlers are considered a high-value unit, and two fly with each US military mission over enemy territory, accompanied by either Navy or Air Force fighter/bomber aircraft. The Growler replaced the Navy's prior EW aircraft, the E/A-6B Prowler when it retired in 2015. The Growlers, their crews, maintenance equipment, personnel and training facilities are all home-ported in one geographic location, NAS Whidbey Island, where the Navy has single sited its electronic warfare jets for 40 years.<sup>1</sup> (One squadron of Growlers is forward deployed to Atsugi, Japan.<sup>2</sup>) This single siting of bases is unique to the Growler, with all other Navy aircraft having at least two bases in the Continental US.<sup>3</sup>

It's never been clear why the Navy has concentrated its EW jet aircraft in one geographic location. Single siting of any military function is a violation of the Technical Joint Cross Service Group (TJCSG) guidelines. TJCSG was formed in the wake of the Base Realignment and Closure Act of 1990 (BRAC) to make recommendations to optimize defense structure for cost and strategy. One of the TJCSG's two guiding principles was *"Maintain competition of ideas by retaining at least two geographically separated sites, each of which would have similar combination of technologies and functions. This will also provide continuity of operations in the event of unexpected disruption."*<sup>4</sup>

Perhaps Navy EW single siting was allowed because historically, other branches of the US Armed Forces maintained electronic warfare jet aircraft. At the time of BRAC, the US Air Force flew the EF-111 Raven and the US Marine Corps flew the E/A-6B Prowler. However, in 1998 the Air Force retired the EF-111 and it was not replaced. Its electronic warfare duties were transferred to the Navy, which then developed land-based ("expeditionary") squadrons to accommodate.<sup>5</sup> The Marine Corps is now in the process of decommissioning its E/A-6B Prowlers, which will retire at the end of FY 2016.<sup>6</sup> The Marines plan to utilize the F-35 Joint Strike Fighter for some of their electronic warfare functions<sup>7</sup>, but the aircraft is not fleet-ready. The F-35 reached initial operating capability in August 2016, but has since been grounded due to electrical problems.<sup>8</sup>

This leaves the Navy in the unique position of holding the entire US military electronic warfare jet aviation asset of 82 Growlers in one vulnerable location. And it has plans to increase this concentration of aircraft. Per its 2016 Draft Environmental Impact Statement (DEIS), the Navy plans to add 35-36 more aircraft to NAS Whidbey, bringing the total number of Growlers to 118. This operational increase is due to a change in the strategy of Growler use, with the goal to dedicate three aircraft per mission instead of two<sup>9</sup>, making the aircraft an even more valuable asset to all forces.

In the same DEIS, the Navy maintains this single siting decision is reviewed annually under the Chief of Naval Operations' Strategic Laydown and Dispersal plan, *"...and is consistent with Navy aviation policy to maximize efficiency of operations by co-locating operational squadrons with support functions, training ranges, and airfields."*<sup>10</sup> The reasons cited for the concentration of Growlers are operational synergy, proximity to training regions and airspace and efficient use of current infrastructure.

Upon review of the references in the DEIS however, there is no citation of the Strategic Laydown and Dispersal Plan and no verification of the Navy's claim of review. The Navy's 2012 Environmental Assessment for the Prowler to Growler transition references the 2008 version of the plan as a rationale to homeport the expeditionary squadrons at Whidbey.<sup>11</sup> Unfortunately, neither the 2008 nor 2011 versions of the Strategic Laydown and Dispersal Plan are available publicly. Operational review of this single siting decision therefore cannot be verified.

The Navy shows no signs of stopping its concentration of EW assets on Whidbey Island even after its proposal in the current DEIS. Per the Selected Acquisition Report from the Department of Defense, the Navy plans to procure another 42 Growlers, bringing the total number of Growlers to 160 aircraft, nearly double the current fleet size.<sup>12</sup> The Navy has not publicly documented where these additional 42 Growlers will be assigned. Less the 7 aircraft forward deployed to Japan that leaves 153 aircraft that will likely be stationed at NAS Whidbey Island.

This means that 95% of the entire US fleet of electronic warfare jets is based a coastal island served only by a bridge and two ferries.

#### **Whidbey Island – Idyllic and Extremely Vulnerable**

Whidbey Island lies in the northern part of Puget Sound in Washington State, 30 miles northwest of Seattle. The Island is home to about 60,000 residents and is part of Island County. Oak Harbor is the largest town on the Island, and has been home to Naval Air Station Whidbey Island since 1942.

Whidbey Island is accessible from the North by the Deception Pass Bridge, which was built in 1935 by the Civilian Conservation Corps, and is on the National Register of Historic Places.<sup>13</sup> The two-lane bridge encompasses two spans and is a total of 1,487 feet long, 180 feet above the water, with an average daily traffic of between 17,000-20,000 vehicles.<sup>14, 15</sup> As Whidbey Island is served by an EPA-designated sole-source aquifer, the Deception Pass Bridge also brings in a 24-inch water line that serves NAS Whidbey and the city of Oak Harbor.<sup>16</sup> The Deception Pass Bridge lies on State Highway 20 and joins Whidbey Island to Fidalgo Island, its neighbor to the North. Fidalgo Island is then connected to the mainland by another bridge near LaConner, Washington.

The only remaining way to access Whidbey Island is by its two ferry routes – from Port Townsend on the Peninsula to Coupeville in Central Whidbey, and from Mukilteo on the mainland to Clinton on

South Whidbey.<sup>17</sup> These ferries are operated by the Washington State Ferry System (WSF), which is the largest in the nation. In 2016, the Clinton to Mukilteo route carried just over 4 million passengers, and 2.2 million vehicles, while the Coupeville to Port Townsend route carried 372,000 vehicles and 819,000 passengers.<sup>18</sup> The ferries operate from 14 to 20 hours per day. Outside these two ferry routes and the Deception Pass Bridge, there are no other ways for vehicles to access the Island.

These limited forms of access can serve as a choke point to limit egress from the Island in an emergency or prevent access of needed commodities or first responders. The 2007 *Hazard Identification and Vulnerability Assessment* from Island County confirms that Whidbey Island is "...vulnerable to several types of transportation emergencies including blocked bridges and interrupted ferry service."<sup>19</sup> Studying them in depth exposes just how vulnerable.

#### **Deception Pass – A Critical Bridge**

Given the limited accessibility of the Island, it's no surprise that the Deception Pass Bridge meets the Federal Highway Administration's criteria of a nationally critical bridge according to a paper from the American Association of State Highway and Transportation Officials (AASHTO) titled "*National Needs Assessment for Ensuring Transportation Infrastructure Security*."<sup>20</sup>

The Deception Pass Bridge is a critical bridge due to the following criteria -

- Casualty risk – its bridge span significantly greater than 50 feet
- Economic risk – it is located on the Department of Defense-defined Strategic Highway Network (STRAHNET),<sup>21</sup> and the bridge's nearest detour is greater than 5 miles away.
- Military support function – due to bridge length and STRAHNET status
- Emergency relief function – it is the major evacuation route for the Island
- National recognition – it is on National Register of Historic Places
- Collateral damage exposure – as it carries utilities (specifically water)

Per the *National Needs Assessment* cited above, the greatest risk to the bridge is an explosive attack scenario. The report goes on to say; "*bridges and tunnels cannot be fully protected against significant disruption to roadway decks from even modest explosive quantities.*" In its analysis the AASHTO notes that as little as 100 to 500 pounds of TNT (placed by hand on members, or driving in a moving van across the bridge) could easily make the bridge non-operational. It is unknown whether any security measures have been taken to reduce risks of a terrorist attack to the Deception Pass Bridge, or what measures are possible on this historic bridge on a public highway.

Additionally, as NAS Whidbey Island is within 15 miles of five earthquake fault lines,<sup>22</sup> Deception Pass Bridge is at high risk of earthquake damage. The bridge remains on the unfunded Washington State list for seismic retrofitting.<sup>23</sup> A major earthquake that damaged the bridge would cripple both the base and the Island for weeks to months.

Whether the risk is from terrorism or natural disaster, Deception Pass Bridge remains a significant point of vulnerability for NAS Whidbey Island, as it is the only method of entrance or egress available 24 hours per day.

### Washington State Ferries – Most Likely Terrorism Targets

Ferries, especially ones that carry vehicles, are one of the most vulnerable modes of transport for terrorist attacks. According to the State of New Jersey Office of Homeland Security and Preparedness (NJOHSP) 2016 intelligence briefing, "...ferries remain susceptible to terrorist attacks because they transport large volumes of people, have limited security, and offer minimal escape options during incidents."<sup>24</sup>

After the September 11, 2001 terrorist attacks, the US Coast Guard was directed to increase general marine security by the Maritime Transportation Security Act of 2002.<sup>25</sup> Further security measures were implemented by the Washington State Ferry system in 2004, after the FBI reported 157 suspicious incidents since 2001, with 19 of them highly likely to involve terrorist surveillance. WSF increased security safeguards to include K-9 screening of 15 percent of cars and 25 percent of box trucks, vans and larger vehicles as well as increased use of sea marshals, aircraft surveillance and armed US Coast Guard fast boats for ferry protection.<sup>26</sup>

Even with security measures in place, the Washington State Ferry system remained highly vulnerable according to analysts. In 2004, a team of Navy and Marines from the Naval Postgraduate School in Monterey, California conducted a "red team" analysis on the vulnerabilities of domestic port security on the West coast. Using a red team approach, military officers strategized according to Al-Qaeda directives about how to best infiltrate and disable ports. They visited Seattle and found security checks to be cursory and were able to easily gain access to restricted areas. The Seattle team concluded the most effective terror strategy would be to detonate explosives simultaneously on five WSF ferries.<sup>27</sup> Their results were unsettling enough that they presented them to local law enforcement, officials of the ferry system, and a national meeting of US mayors in late 2004 before publication of their report.<sup>28</sup>

The FBI went a step further in its risk assessment. In its 2006 report "*The Federal Bureau of Investigation's Efforts to Protect The Nation's Seaports*," the Department of Justice's Inspector General stated, "the FBI believes that ferries in the Seattle area and fuel tankers in the Gulf Coast Region appear to be the most likely targets of maritime terrorism."<sup>29</sup>

The Government Accounting Office (GAO) acknowledged the vulnerability of ferries, noting that the risk of such events was increasing. In its 2010 report "*Maritime Security: Ferry Security Measures Have Been Implemented, but Evaluating Existing Studies Could Enhance Further Security*," the GAO reported that "in April 2010, Coast Guard officials stated that the relative risk to ferries is increasing, as evidenced by attacks against land-based mass transit and other targets overseas." However, the report also notes: "the Coast Guard may be missing opportunities to enhance ferry security," as the Guard had not evaluated or acted on all findings of five agency-contracted studies from 2005-2006.<sup>30</sup>

There is ample agreement from a number of federal agencies and the Coast Guard that ferries are highly vulnerable to terrorist attacks, with Seattle area ferries being one of the two most likely targets in the United States. Agencies continue to implement security measures and train for the worst. The Coast Guard, with local law enforcement conducted SWAT-style drills on Seattle ferries in 2012 that were covered by the local press.<sup>31</sup> WSF implemented a Coast Guard approved security plan in 2013.<sup>32</sup>

However, given that ferries travel on water, there is no way all risks can be mitigated. A humorous video of a sleepy (but fortunate) sailboat captain on autopilot being surprised by a ferry collision

prompted a few chuckles from Seattle locals in late 2016.<sup>33</sup> Taking the red team approach however, it would not be difficult to imagine damaging a ferry with a boat full of explosives in the same manner. The dependence on vulnerable ferry traffic to NAS Whidbey Island represents a security risk the US military cannot afford to take.

#### **Given Operational Security Risks, Does Single Siting Make Operational Sense?**

As stated before, having all of one type of jet aircraft in one location is unique to the Growler in the US Navy, and due to retirement of Air Force and Marine Corps EW jets, the Navy now holds all of the US active EW jet aircraft. Is there a benefit to this? The answer from at least one service seems to be no.

The Marine Corps predict a three- to five-year gap in expeditionary warfare capability as they phase out the E/A-6B Prowler, and await the deployment of the F-35. This leaves the USMC dependent on the Navy to provide EW assets to the Marines, according to an editorial on the website of the US Naval Institute (USNI).<sup>34</sup> The author, Col. H. Wayne Whitten, USMC Retired, states that home porting all E/A-18Gs at NAS Whidbey Island *“raises operational readiness issues.... It’s noble in intent but highly questionable from a roles and mission standpoint that all land-based EW aircraft will be owned by the Navy, the service with the least natural ties and expertise in ground combat operations.”*

The USNI article also describes that single-siting all EW assets in the Pacific Northwest makes it difficult to provide proper cross-training, as *“over half of the Army, Marine Corps, SOF and tactical Air Force units are in the eastern U.S. Additionally, DoD has a sizable investment in East Coast ranges that continue to be under-utilized for EW training.”* Siting new expeditionary Growlers on the East Coast would establish a geographic balance that is *“consistent with long-term Navy policy.”*

Col. Whitten recommends the Pentagon take a look at regional benefits and site new Growlers at Marine Corps Air Station Cherry Point, and not NAS Whidbey Island. *“Ironically, the increase in aircraft loading at NAS Whidbey Island has created an environmental impact even as the draw down in EA-6Bs at Marine Corps Air Station Cherry Point, NC, and delays in the F-35B deliveries are causing serious economic concerns. One would think North Carolina officials would see now is the time to put aside fears that questioning the EA-6B drawdown would somehow be viewed as threatening the F-35B. In fact, they should be making the case to homeport the Navy expeditionary EA-18Gs at MCAS Cherry Point.”*

In 2015, the US Air Force stated that it also planned to use the F-35 for its electronic warfare, rather than new Growlers.<sup>35</sup> It appears that not only the Marines will have to depend on the Navy until the F-35 is fleet-ready.

#### **New Growlers Need a Second Site**

Single siting the entire electronic warfare jet arsenal on the West Coast, with one service, on an island served by a vulnerable bridge and ferries is an major operational security risk. This geographic location also reduces operational readiness in a warfare strategy that right now has only one active aircraft that all services depend upon.

The delivery of 36 new Growler aircraft (plus 42 more on order) provides the Navy with a prime opportunity to site its new EW assets at a more operationally beneficial location. This would not only reduce the environmental impact at NAS Whidbey (whose outlying field does not meet current

standards for the aircraft), but would enhance operational security and readiness, and provide another community the economic benefit of a modest group of vital aircraft. MCAS Cherry Point, North Carolina is a viable option as it has EW infrastructure from its time hosting the E/A-6B Prowler. There are also other options like Naval Air Station Kingsville, Texas, which has a low population density, updated outlying field, proximity to the East Coast and ready access to the Gulf Coast. Given that the FBI considers Gulf Coast oil tankers to also be a prime maritime security risk, having EW aircraft close to the Gulf Coast would make an immense difference in response time to a terrorist attack.

Creative solutions can and must be found to safeguard the Growler, which is a vital asset to US military defense. Loss of jet electronic warfare capability would paralyze all US (and Coalition) airborne missions. Redundancy is key in protecting this vital resource and is practiced with every other jet aircraft the Navy owns. Finding another base for new Growlers will be costly, but not nearly as costly as losing the entire fleet and infrastructure to a terrorist attack or natural disaster.

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<sup>35</sup> <http://www.reuters.com/article/usa-airforce-growlers-idUSL1N0YN1CC20150601>

Coupeville, WA 98239

We are an elderly couple on fixed income and live a block from the Jets' flight path as they head south on their left hand circle at OLF. We moved here in 1998, when the Prowlers flew. Noisy but tolerable (except when they START at midnight.) When the Growlers started, the increase in decible level and the specific frequency of the noise became painful. We cannot be outside when they fly, but must be inside and wearing noise-canceling headphones. The jet noise is ear-splitting. ( My understanding is the Navy has used AVERAGE noise levels, factoring the times the jets do not fly. Not appropriate to understand just how disruptive they are.) If Scenario A is enacted, the average annual flights at OLF will increase from about 6000 to about 34,000, a six-fold increase. If Scenario B, 20,000, or a three-fold increase. Either way, our ability to go outside our house will be severely limited. We cannot move, as we are on a fixed income and our property values, under either Scenario, will cause our house to be worth considerably less than our mortgage. And no one will buy here. When OLF first started in the 1940's, it was in a truly rural area. In the past 70 years, the character of the area has changed considerably. Many people live here now. Although to the eye it may appear rural, it is so only in that the beauty attracts tourists, our primary source of income. That will decline considerably if we have 35,000 flights per year. We actually support the Navy. My husband is Navy, as were my father and two brothers. But we believe it is time for the Navy to explore truly rural areas, like the Boeing training field in Moses Lake. Also, has the Navy considered the risk to the security of the fleet if every Growler is stationed in one place? Seems to us that is putting a big bullseye on this island, If the Navy puts all its eggs in the NAS Whidbey basket, we propose you either pursue an off-island option, or do operations out of Oak Harbor, where the impact to the area's economy would be less, and where the residents seem to love jet noise so much.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.d. Day-Night Average Sound Level Metric
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

Coupeville, WA 98239

1.a. Thank You  
12.j. Property Values  
12.k. Compensation to Citizens for Private Property

One more comment. I live in the flight path of OLF Coupeville. If the number of Growler flights increase significantly, I suggest the Navy mitigate the effects on the residents in such flight path by a)providing ear protection as is done on the flight-line and b)offer to purchase our home, perhaps as Navy housing, at today's market value, plus a moving allowance. I recognize from reading the draft EIS that the Navy has explored alternatives. BUT increased flights will make our home both unlivable and unsellable. That is no way to treat the citizens of this area. Give us the means to move and we will.

Coupeville, WA 98239

We bought property in Smith Prairie outside of Coupeville in 1998 and have lived with the Prowler practices and the increased noise and operations of the Growlers for the last 15+ years. The jets fly one block from our house at an elevation of about 200 feet. This is on their southbound leg, so they don't HAVE to fly so low. This is much lower than the 500 feet minimum they should be flying; and lower than that flown over Oak Harbor when at Ault Field. Now the Navy might multiply the number of OLF flights six-fold? This is an unconscionable burden to the citizens. The noise level is deafening --- literally. 125 decibels. We cannot be outside during flight operations. The glass in our house rattles and our pets are traumatized. We have both suffered significant hearing loss. Due to the freefall the value of our property will experience, we will be unable to move. Yet unable to live here. I believe you will have an increased suicide rate if you implement Scenario A. There will be no way to leave and no way to live here. I have tried to understand the DEIS, and appreciate the effort that has gone into examining alternatives. Reading the DEIS, it appears no landing fields other than Ault Field and OLF Coupeville meet your requirements. I note there are plans to upgrade Ault Field to meet the expanded needs of the Navy. Given a) the Navy plans on upgrading Ault Field b) the jets fly higher for Ault Field than for OLF and c) Oak Harbor citizens are more appreciative of Navy operations, I beseech you to go with Scenario C. We can suck it up and deal with an increase from 6100 to 8800 FCLPs. But to have a six-fold increase (100 flights every single day of the year) while Ault Field landings are reduced from 14,700 to 8,700? PLEASE NO. Thank you for your consideration.

- 1.a. Thank You
- 12.j. Property Values
- 2.m. Record of Decision/Preferred Alternative
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.q. Potential Hearing Loss
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Langley, WA 98260

1.a. Thank You

4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED]

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

*I would like to see the <sup>(Whidbey Health Center)</sup> Coupeville Hospital included in the points tested for noise levels.*

*I'm amazed at the increase in expected flights (6100 to 35,000 a year)*

*This could effect every aspect of our way of life!*

Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 1.d. General Project Concerns
- 4.i. Points of Interest

Olympia, WA 98501

These Growler planes can produce 150 decibels of sound, enough to cause instantaneous hearing loss. ( 110 db is the threshold for permamant hearing loss). In both humans and wildlife, effects from loud noise include hearing loss, increased stress hormones, cardiovascular disease, immune system compromise and behavioral/psychosocial impacts. 1 billion birds (already threatened by climate change) fly up and down the pacific coast using it to navigate. This will cause harm to those birds. The Navy's own supporting documents say: "Friendly Electronic Attack could potentially deny essential services to a local population that, in turn, could result in loss of life." But most important from a climate perspective, each jet burns 1304 gallons PER HOUR and produces 12.5 metric tons of CO2 per hour! Just for perspective that is 23% more than the ANNUAL CO2 emissions of a WA state citizen! (Then multiply by up to 118 jets x 260 days a year 14-16 hours a day, at altitudes as low as 1000 feet) This is outrageous that to practice war we would destroy the beautiful peninsula and our planet! Our planet cannot afford these kind of "games".

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.i. Bird Migration
- 18.b. Average Carbon Dioxide per Aircraft
- 19.d. Electronic Warfare
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Freeland, WA 98249

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.



Freeland, WA 98249

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Freeland, WA 98249

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Freeland, WA 98249

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.

Freeland, WA 98249

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Freeland, WA 98249

1.a. Thank You

4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month").

Freeland, WA 98249

1.a. Thank You  
7.c. Noise Disclosure

Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Freeland, WA 98249

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Freeland, WA 98249

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.



1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Freeland, WA 98249

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Freeland, WA 98249

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

Freeland, WA 98249

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Freeland, WA 98249

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

Freeland, WA 98249

1.a. Thank You

4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Freeland, WA 98249

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

1.a. Thank You

Victoria, British Columbia V8T 2R4

I hear the EA-18Gs and support their activity. Defense preparedness is important to me and training is necessary. I welcome the assurance of the 18s and their activity.

Coupeville, WA 98239

Hello, Let me preface this by saying that I am pro Navy, and my great uncle was Rear Admiral [REDACTED]. Uncle [REDACTED] was a Naval Aviator, and I am very proud of his service. I felt compelled to comment here out of a concern for our community of Coupeville if there is a dramatic increase of FCLP at OLF Coupeville. Coupeville and Central Whidbey are very reliant on tourism, particularly during the summer months. I have already experienced tourists stating that they will not return to Coupeville after hearing the jets last summer. I truly believe that an increase in FCLP at OLF Coupeville will have a profoundly negative economic impact on our tourism industry. In light of this, I would like to see a light tempo of FCLP at OLF Coupeville from June through September, which is the height of our tourism season. Perhaps during these months OLF Coupeville has 20% or less of the total FCLP? I realize that this impacts Ault Field, but that area is not as dependent on tourism as Central Whidbey is. Additionally, to be fair to all residents of Central Whidbey, I would like the FCLPs to be split evenly at OLF Coupeville between Runways 14 and 32. This is in reference to page 3-11, Volume 1, of the DEIS. Lastly, and on a personal note, I have two little girls. When the jets are flying at OLF Coupeville they are unable to be outside, which saddens me considering how healthy it is for kids to be outside playing. Thank you for your consideration.

- 1.a. Thank You
- 12.h. Tourism
- 12.n. Quality of Life
- 2.m. Record of Decision/Preferred Alternative
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 7.d. Recreation and Wilderness Analysis and Study Area



Port Townsend, WA 98368

1.a. Thank You

2.n. Alternatives Considered But Eliminated

With only 5 miles, as the crow flies, separating our home from the touch n go strip where the Growlers practice near Coupeville, the surrounding Puget Sound waters act as a drum to magnify the jet noise. We feel like we are at the end of the runway and the effect is to literally stop conversation and interrupt normal activities. Surely there are other places to conduct this training that are many more miles from homeowners and small businesses.

1.a. Thank You

Pahoa, HI 96778

Bouncing at nite at Coupeville OLF was a crucial part of me as a RAG Instructor to getting students ready for the boat. Essential to safety and training.

Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name \_\_\_\_\_

2. Last Name \_\_\_\_\_

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Lopez Island, WA

5. E-mail \_\_\_\_\_

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

## Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

### January, 2017 Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

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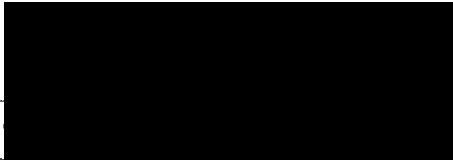
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Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name 

2. Last Name 

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Lopez Island, WA 98261

5. E-mail 

6. Please check here  if you would NOT like to be on the mailing list

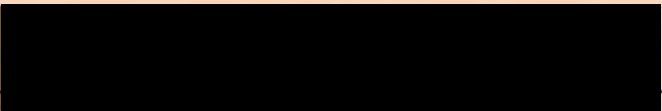
7. Please check here  if you would like your name/address kept private

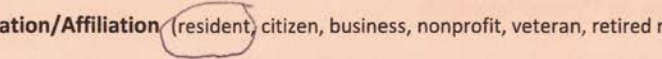
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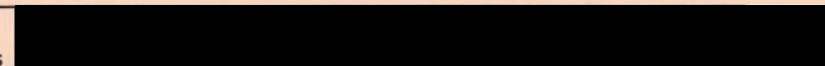
**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

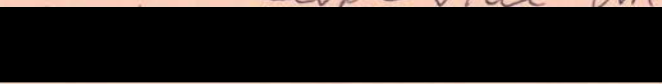
**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name 

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  


3. Address   
*Capeville VA 98239*

4. Email 

**Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.**

**Comments**

**Please check all that concern you and add additional comments on the back.**

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquifer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I am concerned ABOUT the LARGE POTENTIAL INCREASE in OLF GROWLER FLIGHTS that will IMPACT noise, planes near Coupeville HS + MS, WATER CONTAMINATION OF city + private wells, IMPACTS ON TOURISM and business + NO alternate Growler Fields Planned FOR.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military) \_\_\_\_\_

3. Address \_\_\_\_\_ *Coupeville VA 98239*

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

The proposed increase in flights at OLF would severely negatively impact Coupeville Business + Tourism. Noise mitigation is not adequately addressed in the EIS, neither is all Coupeville schools impacted by aircraft noise + water contamination is not thoroughly addressed or excluded.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

Coupeville, WA 98239

The proposed expansion of Naval Station Whidbey Island, and OLF specifically, concerns and affects me and my neighbors. Scenarios A and B will result in a four to fivefold increase in flight operations at OLF, Whidbey Island. This will negatively affect our property values, much increased noise, negative effects on tourism, and small business, the lifeblood of our city and area. No study was included on the effect of these large flight increases on Coupeville high school or middle school. No accurate studies were measuring the toxicity of area wells from OLF in the PFOA and PFOS discovered SO far in well testing near OLF. Why are there more positive testing for these toxins near OLF (8 wells so far) but only 1 near Ault field in Oak Harbor, which has a Sperrfund toxic designation? How did the wells get toxins in their water if the planes do "touch and go" and how much worse is the contamination going to be with a four or five fold increase in OLF training flights? Growler flights are only based on Whidbey Island without another base for these aircraft elsewhere in the country? Why can't another base be designated as a Growler base? Why have all Growlers at one location and overload Whidbey Island and subject residents and taxpayers to constant noise and disruption? Growlers based elsewhere could train with other aircraft and have a much larger area to fly and not impact our small city. The Navy has attempted to be a considerate neighbor over the years. Subjecting our small rural town to such a large increase in flights harms the citizens it wishes to protect and ceases to be a good neighbor. Please choose mitigating choices to avoid the massive proposed OLF training flights. These should include another base to house Growlers, perhaps on the East coast or by the Great Lakes, a "hard" ceiling on OLF training flights to be no more than 20% of the current 6100 flights per year.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference

Coupeville, WA 98239

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United Nations Convention against Torture defines torture as “any act by which severe pain or suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment. The DEIS misconstrued an important finding of the National Park Service’s 2015 noise study at Ebey’s Landing Historic National Reserve and obfuscated a forthright analysis of the impacts on visitor experience. That misconstruction has to be credibly revised to properly characterize the real impacts. Proposed large OLF flight increases are not compatible with town of Coupeville small business and tourism nor our family's health.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects





## Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name

2. Organization/Affiliation

3. Address

4. E-mail

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

My Family Lives in Loupeville, 2 miles  
from OLF. I am very concerned that  
a much larger number of FCLP  
flights will be actually so close to  
my house + town.

I would want the increased flights  
of OLF to be the minimum so the  
town will not be negatively affected  
by increased noise, air pollution,

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic

6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1.a. Thank You

1.d. General Project Concerns

11.a. Groundwater

11.d. Per- and Polyfluoroalkyl Substances

12.c. Socioeconomic Impacts

12.h. Tourism

2.m. Record of Decision/Preferred Alternative

6.b. National Ambient Air Quality Standards Compliance

7.a. Regional Land Use and Community Character

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

possible water contamination as our wells are adjacent to OLF.

Coupeville depends on small business and tourism, both of which will be impacted very much by even a small increase in flights at OLF.

The Navy has been a good neighbor and I would want an increase in Growler flights to be the least possible, impact of noise + economic damage to Coupeville as possible.

Even a 50/50 split of Growlers between OLF + AVU field would mean 4x the existing flights at OLF as currently been done. This amount of increase would severely impact the quality of life in Coupeville, damage its business + tourism and create future conflict points between the Navy and the people of Coupeville.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command  
 (NAVFAC) Atlantic Attn: Code EV21/SS  
 6506 Hampton Blvd.  
 Norfolk, VA 23508

[REDACTED]  
 [REDACTED]  
 Coupeville, WA 98239

December 9, 2016

To Whom it may concern;

This is in reference to the US Navy Environmental Impact Statement for EA-18G Growler air field operations at NAS Outlying Field in Coupeville, WA. Since I am a Coupeville resident, I am concerned about the impact on our quality of life here.

**I have read the EIS and have the following concerns:**

- The City of Coupeville's drinking water is contaminated with PFOA (perfluorooctanoic acid) which is in the fire retardant AFFF (aqueous film forming foam) used at OLF. Coupeville gets its entire drinking water supply from the aquifer wells near OLF. **This has not been addressed in the EIS.** Since the United States has banned the use of this chemical, why is it still being used?
- Ebey's Reserve decibel readings are flawed, since they were taken in 2016, at a time when not many flights were occurring at OLF.
- Averaging decibel readings over a 24 hour period is flawed. Practicing jets do not fly 24 hours straight, they usually fly in 2 or 4 hour segments. All decibel readings should be done in an 8 hour period and compared to OSHA standards ( $\geq 85$  dB results in hearing loss and requires ear protection).
- Noise generated when jets arrive and depart OLF is not included in the EIS.
- Survey 8 hour decibel levels in areas closest to OLF and in those noise zones where  $\geq 85$  dB are anticipated. Extrapolate data to include flight numbers from Scenarios A, B and C.

**Suggestions to clarify the EIS for the Public:**

Concrete examples should be provided:

- Scenario C Projected Flights (20% OLF/80% ALT Field)  
 9000 flights (increase of 30%)  
 This amounts to 30/day, 5 days a week or 75/day, 2 days a week.
- Scenario A Projected Flights (80% OLF/20% ALT Field)  
 30,000 flights (increase of 500%)  
 This amounts to 100/day, 5 days a week or 250/day, 2 days a week.

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports
- 4.t. Noise Mitigation

**Conclusions (in order of preference):**

1. Immediately stop the use of AFFF.
2. No additional Growlers at NAS Whidbey
3. If additional Growlers, provide additional facilities to decrease noise and ground water pollution impact, like another runway in a remote area.

Yours truly,

A large black rectangular redaction box covering the signature and name of the sender.



Coupeville, WA 98239

I have read the EIS and have the following concerns: 1. Ebey's Landing decibel readings are flawed since they were taken in 2016 when a low number of flights occurred. 2. Averaging decibel readings over a 24 hour period is flawed. All readings should be done in an 8 hour period extrapolating to the #flights in Scenarios A, B and C and compared to OSHA standards (85 dB cutoff for requirement of ear protection) 3. Noise when jets arrive and leave OLF is not included in the EIS. Suggestions: Provide examples for public understanding of impact of increased flights: eg, Scenario C would result in a 30% increase in flights, 30/day, 5 days a week or 75/day, 2 days a week. Extrapolate 8 hour dB readings to show expected noise levels; Scenario A would result in a 500% increase in flights to 100/day 5 days a week or 250/day 2 days a week and extrapolate expected noise levels as above. Conclusion: Unless additional facilities are provided to decrease noise impact on surrounding communities (like another runway in a remote area to be used in addition to OLF and ALT Field), no additional Growler aircraft should be accepted.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.j. Other Reports
- 4.m. Supplemental Metrics

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command  
 (NAVFAC) Atlantic Attn: Code EV21/SS  
 6506 Hampton Blvd.  
 Norfolk, VA 23508  
 December 4, 2016

[REDACTED]  
 [REDACTED]  
 Coupeville, WA 98239

- 1.a. Thank You
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.t. Noise Mitigation

To Whom it may concern;

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**I have read the EIS and have the following concerns:**

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- Averaging decibel readings over a 24 hour period is flawed. Practicing jets do not fly 24 hours straight, they usually fly in 2 or 4 hour segments. All decibel readings should be done in an 8 hour period and compared to OSHA standards ( $\geq 85$  dB results in hearing loss and requires ear protection).
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Concrete examples should be provided:

- Scenario C Projected Flights (20% OLF/80% ALT Field)  
 9000 flights (increase of 30%)  
 This amounts to 30/day, 5 days a week or 75/day, 2 days a week.
- Scenario A Projected Flights (80% OLF/20% ALT Field)  
 30,000 flights (increase of 500%)  
 This amounts to 100/day, 5 days a week or 250/day, 2 days a week.

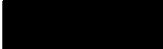
**Conclusions (in order of preference):**

1. No additional Growlers at NAS Whidbey
2. If additional Growlers, provide additional facilities to decrease noise impact, like another runway in a remote area.

Yours truly,

[REDACTED]

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command  
 (NAVFAC) Atlantic Attn: Code EV21/SS  
 6506 Hampton Blvd.  
 Norfolk, VA 23508

  
 Coupeville, WA 98239

December 9, 2016

To Whom it may concern;

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**I have read the EIS and have the following concerns:**

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**Suggestions to clarify the EIS for the Public:**

Concrete examples should be provided:

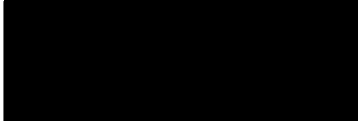
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 9000 flights (increase of 30%)  
 This amounts to 30/day, 5 days a week or 75/day, 2 days a week.
- Scenario A Projected Flights (80% OLF/20% ALT Field)  
 30,000 flights (increase of 500%)  
 This amounts to 100/day, 5 days a week or 250/day, 2 days a week.

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports
- 4.t. Noise Mitigation

**Conclusions (in order of preference):**

1. Immediately stop the use of AFFF.
2. No additional Growlers at NAS Whidbey
3. If additional Growlers, provide additional facilities to decrease noise and ground water pollution impact, like another runway in a remote area.

Yours truly,



Coupeville, WA 98239

After attending a Coupeville Town Council meeting, living under the flight path of the OLF, and reading portions of the Draft EIS, I make the following comments. My family has lived in the Coupeville area since 1950 and we have been supporters of the Navy base and the need to train pilots. What the Navy is now proposing, however, is orders of magnitude greater in impact on human health and the environment. Because the DEIS does not address many areas of impact, and does not provide information in plain language on many of the impacts it does address, it is inadequate and must be supplemented. (1) For example, the DEIS mentions some hearing loss for those living in the flight path but it only offers modeling data and graphs; it doesn't explain what this means in terms of impact on the daily activities of impacted people. Numerical data and models do not tell us how our lives will change. If parents and grandparents can no longer hear the voices of their children, it is a major loss of quality of life. If people can no longer hear bird song and other sounds of nature, it is a major loss of quality of life. If we cannot hear normal conversation, we all are diminished in our ability to participate in daily living. Permanent physical loss of hearing for more than 1,000 people needs a major section or data and analysis, including consideration of whether any mitigation is possible. (2) The executive summary section for the DEIS is woefully inadequate. It contains technical descriptions of data collection and modeling but no plain language to describe the impacts on the lives of impacted people. Decision-makers need to know how their decisions will affect the lives of surrounding people for many years.

- 1.a. Thank You
- 12.n. Quality of Life
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation

Burlington, WA 98233

- 1.a. Thank You
- 2.a. Purpose and Need

Please stop the madness. I strongly object to any use of any war toys anywhere but particularly over our heads. Since the supposed threat to us is NOT a massive army why do we need more of this junk?

- 1.a. Thank You
- 4.a. General Noise Modeling

Waldron, WA 98297

Too much noise from too many growlers!!! Need better more accurate noise assessment.  
Do not need more Growlers.

Coupeville , WA 98239

I am deeply concerned not only with the proposed increase in flights at the OLF, but the change in the flight patterns. The current flight path for OLF on runway 14 for daytime flights somewhat minimizes the impact to the population by flying downwind near the airfield, not over the shoreline where many of the homes are located. See figure E-16, page A-314 of Appendix A. The existing nighttime flights also minimizes the impact on the population by flying downwind over the water between Whidbey and Camano islands and extends north over Penn Cove. See figure E-17, page A-315 of Appendix A. This flight path has been used since at least the mid 1960's. The proposed flight path for OLF on runway 14 is to fly directly over the shoreline for both day and night flights thus maximizing the sound impact to the community. See figure E-18, page A-316 and figure E-19, page A-317. Mention or discussion of this change or the rationale for it could not be found anywhere in the document. Because of the proposed change in the flight path for runway 14 at OLF, several miles of shoreline and the homes along this shoreline will unnecessarily be in a new Accident Potential Zone (APZ). See Figure 4.3-2, page 4-118 of Chapter 4. When we purchased our home on an elevated property overlooking the shoreline, we had never lived close to a body of water before, so never realized the amplification of sound such positioning involves. Indeed, someone carrying on a normal level of conversation on a boat anchored in the water near the shoreline, can be heard clearly in our home. This amplification of sound possibly explains the shattered glass in our home several years ago during a low flyover by a Growler. That shattering of glass nearly decapitated our cat, and had a human been in the room where the glass shattered, that person could have been seriously injured or even killed. I have copies of the complaint I filed with the Navy and the Navy's denial of our claim due to the flight being "intentional" and not negligent. Please be advised that any future property damage or personal injury incurred as a result of these flights will be met by litigation and worldwide publicity. The Navy is intentionally harming the very citizens it has sworn to serve and protect.

- 1.a. Thank You
- 12.k. Compensation to Citizens for Private Property
- 3.d. Arrivals and Departures
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 5.a. Accident Potential Zones



Coupeville, WA 98239

The March 2017 issue of Consumer Reports, the most trusted consumer publication in America, has as its focus Boosting Health and Happiness in Your Home. On page 32, the issue of noise is discussed. It speaks to how ambient noise in the home can take a toll on one's body and mind, and provides ideas for reducing such noise. In pertinent part it states: "keep the TV and music speakers at a volume where it's still easy to have a conversation" and suggests they should not exceed 45 decibels. Even the Navy, itself, has measured the noise levels near the OLF at nearly twice that level, and many of us have measured noise levels in our homes at over 110 decibels. Indeed during one flyover, glass in my home shattered and nearly decapitated our kitten. The proposed increase in practice at the OLF would have this 100 decibel noise continuous over our homes, businesses, hospital and schools all day and into the night every day of the week, year round. Will the Navy accept liability for our physical and mental suffering? If the Navy wants to turn all of Whidbey Island into a navy base, then buy out all affected homes and businesses on the Island at today's prices and destroy our beautiful communities all at once. Do not kill us off one by one, or force us to move after destroying most of our life savings - our homes. It would indeed be much less expensive for the Navy to explore alternative sites for Growler training and allow this second oldest community in the State of Washington to retain its quiet, rural, healthy character.

- 1.a. Thank You
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss

I had lunch today with a friend who is a court reporter. We began talking about the Navy's planned increase of activity at the OLF. Coupeville is the country seat of Island County. It is the home not only of all county government and services, but of the county court system. I was a practicing lawyer before retirement. I made frequent use of court reporters' skills. She asked me how she was going to do her job, when planes would be flying over every 5 or 6 minutes for hours every day, drowning out her ability to hear the people whose testimony she was paid to transcribe. Made me think - how is anyone in Coupeville or the surrounding area supposed to earn a living? No one can concentrate, let alone have a conversation, teach a class, ask a question, tend a garden or farm when the Growlers are flying at the OLF. No one can perform their jobs the next day when deprived of sleep when the Growlers fly all night. Is it the Navy's intention to drive everyone out of Washington State's second oldest community and turn Coupeville into a ghost town?

Coupeville , WA 98239

The EIS is more than 1,500 pages long, when the NEPA requires it to be less than 300 pages. An EIS of this length discourages thorough review and analysis by the average citizen. Those that can't afford to hire someone to review and interpret it are at a distinct disadvantage in responding adequately to it. Alternatives to basing all Growlers at NASWI are not evaluated in the EIS. The alternatives presented deal with the allocation of the flights between the two fields and does not consider the possibility of conducting the training where the impact on the population and environment is mitigated. The noise modeling used in the EIS is outdated and inappropriate. Use of noise averaging criteria is not appropriate for military flight operations. Actual noise measurements were not made by the EIS preparers, and actual measurements made by professionals show noise levels far in excess of that predicted by the modeling. The EIS does not thoroughly consider jet noise reduction measures. Crash frequency is not addressed in the EIS. Childhood learning disability & hearing damage not addressed sufficiently. The impact to children is not adequately addressed, from that on students learning at Coupeville Middle and High Schools to children playing at Rhododendron Park. There is no adequate analysis of the economic impact on tourism, property value loss, decline of population, and loss of businesses. Impact to avian migration, habitat & wetland species near shorelines is not addressed, neither on Whidbey Island or in the flight paths, such as over or next to Cypress Island. In late August of this year, I experienced a jet flyby on Cypress Island that shook the ground. Cypress Island is nowhere near the practice landing fields, but having a jet fly by at treetop level up Rosario Sound proves that the impacts of increased flights will not be limited to the areas right around the two fields. There will be an impact on Ebey's Landing National Historical Reserve, including tourism, cultural landscape, soundscape, and natural resources. This hasn't been adequately addressed in the EIS. For example, the concrete barrier that was placed around OLF before the impacts were assessed impacts the Ebey's Landing reserve and has not been addressed. The dumping of jet fuel and the water quality degradation potential to the sole-source aquifer needs to be thoroughly addressed - this is a crucial impact that should not be overlooked! The impact of increased flights over Olympic National Park for electronic warfare training is not adequately addressed. This park has been measured to be one of the last quiet places on earth, and the navy's flights will change this and impact many species, some of them endangered, such as the marbled murrelet. Thank you for your consideration of these comments."

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.l. Bird Migration
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve

coupeville , WA 98239

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- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve

██████████  
 Coupeville, WA 98239  
 December 20, 2016

EA-18G, EIS Project Manager  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard  
 Norfolk, VA 23508  
 Attn: Code EV21/SS

To whom it May Concern:

“International law [also] prohibits mistreatment that does not meet the definition of torture, either because less severe physical or mental pain is inflicted, or because the necessary purpose of the ill-treatment is not present. It affirms the right of every person not to be subjected to cruel, inhuman or degrading treatment. Examples of such prohibited mistreatment include being forced to stand spread eagled against the wall; being subjected to bright lights or blindfolding; being subjected to continuous loud noise; being deprived of sleep, food or drink; being subjected to forced constant standing or crouching; or violent shaking. In essence, any form of physical treatment used to intimidate, coerce or "break" a person during an interrogation constitutes prohibited ill-treatment. If these practices are intense enough, prolonged in duration, or combined with other measures that result in severe pain or suffering, they can qualify as torture.”

First, This entire so called EIS process is a fraud. We, citizens, went thru this process three years ago to determine if the Navy could legitimately conduct training exercises at the OLF in Coupeville. The EIS conducted at that time was never finalized, nor was any result announced. Thus, without ever reaching a public verdict on whether ANY such training could be conducted over the homes of citizens without exceeding what is environmentally permissible and what harm might befall citizens, the Navy is now studying how much more activity is permissible without having ever established a baseline.

Second, Just as I and many others argued three years ago that there was no acceptable level of noise generated by Growlers doing touch and goes that was not harmful to all mammals and avian life, increasing that number by any amount is also unacceptable.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 12.j. Property Values
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 3.a. Aircraft Operations
- 4.a. General Noise Modeling
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Third: Citizens are being subjected to “continuous loud noise,” “sleep deprivation” and vibrations that cause physical pain that, were we enemy combatants, would result in the US Navy being prosecuted for war crimes under the Geneva Conventions. The Navy must not be permitted to inflict torture on the very same citizens they are sworn to “serve and protect.”

Fourth: Implementation of any of the three alternatives proposed, as well as resumption of the existing schedule never authorized by the previous EIS, would result in rendering the homes of residents in the vicinity of the OLF unsaleable and therefore worthless. The Navy will, therefore, essentially confiscate the property of citizens not engaged in any criminal activity, without going through the legally required process of eminent domain. Further, should the Navy first drive down the sale prices of homes and later implement eminent domain proceedings, such would constitute theft.

Very truly yours,

[REDACTED]  
[REDACTED]

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
[REDACTED]

3. Address [REDACTED] *Coupeville WA 98239*

4. Email [REDACTED]

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

*believe the non-auditory (ie: cardio-vascular, sleep disturbances etc) risks have been vastly underestimated.*

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



Langley, WA 98260

To Whom It May Concern: I have been a Langley resident for more than ten years. In that time, and for many years before, I have spent a lot of time enjoying our many local and state parks and beaches as well as the historic town of Coupeville. On many occasions I've experienced the extreme noise levels produced by Growler jets practicing their landings and take-offs at both Ault Field and OLF. Because of this personal experience, I am very concerned about the proposed increases in Growler numbers and the resultant increases in FCLPs. The DEIS does not realistically portray or address the problematic issue of increased noise around the two air fields. It appears from reading the EIS that no actual noise measurements were made, and instead, modeling programs were used to evaluate expected noise levels. I believe actual noise levels must be measured and evaluated before there can be a decision to further increase Growler flights. There is discussion of findings that noise below 65 dB DNL doesn't significantly bother most people. I have experienced the noise from nearby Growlers, however, and I can't imagine ANYONE being okay with the level of noise a Growler makes if you have to hear it over and over again. I could see that there are situations where using DNL to evaluate noise impacts might make sense. I strongly believe, however, that this is NOT one of those situations. The noise is just too intense, and to hear it over and over again in my place of work or at my own home would just be unbearable, no matter how nice and quiet the times are in between. I believe bringing the 35 or 36 new Growlers to Whidbey and having them do all their training here will have a huge impact on the people living nearby and people from all over who hope to have a nice outdoor experience. I'm also concerned that the potential negative effects to wildlife are so inadequately addressed. To say that the increases won't affect wildlife is unrealistic and untrue. Even if wild animals and birds can be habituated to man-made noise, the fact that the Growler noise is sporadic and intense makes habituation far less likely. I'm also concerned that the Navy hasn't adequately addressed potential increases to groundwater and soil contamination. It appears that in the EIS they restrict their evaluation to the runways and land immediately adjacent to runways. Realistically, however, there is potential for an accident or fuel spill over a much wider geographic area. People on Central and South Whidbey depend on clean groundwater from our aquifers for drinking. Recent tests showing groundwater dangerously polluted with PFOAs near Coupeville, are directly related to Navy activities at OLF. This current contamination and the likelihood of further contamination must be addressed. Furthermore, the Navy states in its DEIS that there won't be significant increases to air pollution. This is absurd, considering the amount of fuel that will be used for all the practice flights of the new Growlers. It may be impossible to know how the increased air pollution will affect local areas, but to say that there wouldn't be an increase is simply untrue. Finally, it seems that the issue of the serious devaluation of private property isn't addressed at all. Most people wouldn't choose to buy a home near OLF or Ault Field and subject themselves to the intense, intermittent noise of the Growlers. People who already own property and businesses in these areas can expect to see their property values plummet. How will the Navy compensate these people? How will Coupeville, which depends so much on tourism, survive financially when it becomes so unappealing for people to visit? I expect many businesses to fail and

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 17.a. Hazardous Materials and Waste Impacts
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

the town as a whole to falter financially if there's a large increase in Growler flights at OLF.

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
resident

3. Address [REDACTED] Coupeville WA 98239

4. Email N/A

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
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(over)

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- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
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- 12.l. Community Service Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
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- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
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- 5.c. Condition of Outlying Landing Field Coupeville
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- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
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- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

Didn't we learn at Pearl Harbor not to put all our eggs in one basket. Hold true today to want to put all our Growlers on one little island!

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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Coupeville, WA 98239

1, The DEIS ignores the enhanced noise impact of flying over water. Jet noise, as well as other noise, is reflected and amplified by flights over bodies of water. The flight pattern depicted for OLF involves over-water patterns. This will unduly affect residents along Penn Cove, particularly during nighttime flights which, in the summer often go on to one AM or even later. 2. The report, "Invisible Costs" by reputable economist Michael H. Shuman, refutes claims made in the DEIS about the economic benefits of NASWI. In the period 2010 to 2021 Whidbey Island taxpayers will be expected to pony up \$122 million that it would not have to expend were it not for the presence of NASWI. The Department of the Navy needs to redo this section of the DEIS as the Navy's hype has been blasted out of the water. 3. A report issued by the Washington State Department of Health has blasted yet another one of the Navy's unsupported claims out of the water! The Health Department's report states unequivocally, "the current body of scientific literature suggests that the noise levels similar to those reported from the NAS Whidbey Island Complex pose a threat to public health." The Department of the Navy needs to go back and correct statements, and conclusions, to the contrary.

1.a. Thank You  
12.b. Invisible Costs  
4.a. General Noise Modeling  
4.r. Nonauditory Health Effects  
4.s. Health Impact Assessment and Long-term Health Study  
Requests

[REDACTED]  
Coupeville, WA 98239  
December 13, 2016

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

Attn: Code EV21/SS

Dear US Navy:

I have reviewed the Draft Environmental Impact Statement for EA 18G "Growler" Aircraft Operations at Naval Station Whidbey Island, Washington. The quality of the study was very disappointing. The Navy needs to go back and redo this analysis.

Although this study is clearly a "draft", almost all of the references in the study referred to it as an EIS. That misinformation should be addressed.

A draft environmental impact statement should analyze several alternatives. This study did not. The first alternative listed, the "No Action" Alternative is not truly an alternative because the decision has already been made to purchase additional Growlers and the Navy has already decided to station them at NASWI. Alternatives 2, 3 and 4 are really the same alternative, with minimal differences that would have no impact to anyone other than base personnel. A valid study would have real alternatives presented, such as stationing some of the new Growlers elsewhere or conducting some FCLP operations off-island.

The purported noise analysis is defective. It is based on a computer model and the Navy has failed to do any on-site testing to verify the study results. Furthermore, the use of the DNL noise contour methodology is an artful deception designed to obfuscate the actual impacts of jet noise on our community.

If effectuated, the proposed actions would have a devastating impact on our community. They would depress property values, ruin our tourism industry and cause a major loss of jobs. The study failed to take into account the effect that the 600% increase in FCLP operations would have on Ebey's Landing National Historic Reserve. This Reserve is a unique national park that preserves features and patterns of settlement and development associated with Native American use and occupation, early pioneer emigration, New England sea captain's settlement, and military encampments, all within the context of a working viable community. This Reserve was established by the US Congress in 1980 as the first and one of the largest such reserves in the United States. Its 22 square miles encompass farmlands, Fort Ebey State Park, beaches, parks, trails and 91 nationally registered historic structures.

The DEIS left unresolved the major issue of Accident Potential Zones. And, the study failed to address the major issue of groundwater pollution created by the use of Aqueous Film Forming Foam. With a potential 600% increase in FCLP operations at OLF, we can expect a 600% increased chance of aircraft accidents, which NASWI will address with the foam that will pollute groundwater.

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 18.a. Climate Change and Greenhouse Gases
- 18.d. Washington State Greenhouse Gas Goals
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 3.a. Aircraft Operations
- 3.d. Arrivals and Departures
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.k. Comparison of the Prowler to the Growler
- 4.m. Supplemental Metrics
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 6.b. National Ambient Air Quality Standards Compliance
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.g. Ebey's Landing National Historical Reserve

8.b. Section 106 Process

8.f. Cultural Landscape and Impacts to Ebey's Landing National  
Historical Reserve

To summarize, the subject draft environmental impact statement does not satisfy the requirements of the National Environmental Policy Act of 1969. In addition, it appears that NASWI is in violation of the following:

- Environmental Health and Safety Risks to Children (Executive Order)
- Safe Drinking Water Act of 1974
- Historic Preservation Act of 1966

In addition, compliance with the National Ambient Air Quality Standards is questionable.

My detailed comments are appended hereto. I look forward to a more responsible and responsive study replacing the current inadequate one.

Sincerely,

A solid black rectangular redaction box covering the signature area.



## DEIS for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex Comments

### Noise:

The DEIS states, on page ES-5, that the proposed action would have a significant impact on the noise environment as it relates to aircraft operations at Ault Field and OLF Coupeville, then it goes on to attempt to backtrack on this statement. Astonishingly, the Navy has never done on-site noise testing!

The methodology employed to analyze the noise impacts for this study is seriously, and fatally, flawed! The Navy used a DNL noise contour that averages noise levels over a 24-hour period. Unfortunately humans do not hear average noise, humans hear noise when they hear it. A 65dB noise level contour does not provide an adequate baseline to analyze impact. During FCLPs at OLF affected individuals commonly endure noise levels in excess of 110dBs. This is unacceptable!

It appears that the DNL noise contour level methodology was used as an artful deception, designed to obfuscate the actual impacts of jet noise caused by operations at OLF. The deficiencies related to the noise study are outlined in very specific detail in the August 16, 2016 letter from Port Townsend Mayor Deborah S. Stinson to Commanding officer, NASWI, and the September 1, 2016 memorandum from Ken Pickard, President COER. Further, the report prepared by Dr. Dalhgren on the public health impacts of jet noise and the noise study prepared by JGL Acoustics were both demeaned and disregarded by the preparers of this study.

The DEIS fails to take into account the effect of sound over water. Aircraft noise can be exacerbated by proximity to water. We have noted such events when aircraft is overflying Penn Cove.

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Other Comments:

I noted what I believe to be a typographical error in Table 3.10-4. In the column "other services", I presume it should read "except public administration", instead of "expect public administration."

1.a. Thank You

Oak Harbor, WA 98277

I have lived on central Whidbey Island for 27+ years. I believe the Growlers and NASWI play a vital role in our nation's defense. My quality of life and my health have not been negatively impacted by their activities.

Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). Nor was there consideration paid to basing some Growlers on the East Coast.

COupeville, WA 98239

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

[REDACTED]  
 Coupeville, WA 98239  
 December 13, 2016

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

Attn: Code EV21/SS

Dear US Navy:

I have reviewed the Draft Environmental Impact Statement for EA 18G "Growler" Aircraft Operations at Naval Station Whidbey Island, Washington. The quality of the study was very disappointing. The Navy needs to go back and redo this analysis.

Although this study is clearly a "draft", almost all of the references in the study referred to it as an EIS. That misinformation should be addressed.

A draft environmental impact statement should analyze several alternatives. This study did not. The first alternative listed, the "No Action" Alternative is not truly an alternative because the decision has already been made to purchase additional Growlers and the Navy has already decided to station them at NASWI. Alternatives 2, 3 and 4 are really the same alternative, with minimal differences that would have no impact to anyone other than base personnel. A valid study would have real alternatives presented, such as stationing some of the new Growlers elsewhere or conducting some FCLP operations off-island.

The purported noise analysis is defective. It is based on a computer model and the Navy has failed to do any on-site testing to verify the study results. Furthermore, the use of the DNL noise contour methodology is an artful deception designed to obfuscate the actual impacts of jet noise on our community.

If effectuated, the proposed actions would have a devastating impact on our community. They would depress property values, ruin our tourism industry and cause a major loss of jobs. The study failed to take into account the effect that the 600% increase in FCLP operations would have on Ebey's Landing National Historic Reserve. This Reserve is a unique national park that preserves features and patterns of settlement and development associated with Native American use and occupation, early pioneer emigration, New England sea captain's settlement, and military encampments, all within the context of a working viable community. This Reserve was established by the US Congress in 1980 as the first and one of the largest such reserves in the United States. Its 22 square miles encompass farmlands, Fort Ebey State Park, beaches, parks, trails and 91 nationally registered historic structures.

The DEIS left unresolved the major issue of Accident Potential Zones. And, the study failed to address the major issue of groundwater pollution created by the use of Aqueous Film Forming Foam. With a potential 600% increase in FCLP operations at OLF, we can expect a 600% increased chance of aircraft accidents, which NASWI will address with the foam that will pollute groundwater.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.e. Agriculture Analysis
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- 12.l. Community Service Impacts
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- 12.n. Quality of Life
- 18.a. Climate Change and Greenhouse Gases
- 18.d. Washington State Greenhouse Gas Goals
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 3.a. Aircraft Operations
- 3.d. Arrivals and Departures
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.k. Comparison of the Prowler to the Growler
- 4.m. Supplemental Metrics
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
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- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 6.b. National Ambient Air Quality Standards Compliance
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones



7.g. Ebey's Landing National Historical Reserve

8.b. Section 106 Process

8.f. Cultural Landscape and Impacts to Ebey's Landing National  
Historical Reserve

To summarize, the subject draft environmental impact statement does not satisfy the requirements of the National Environmental Policy Act of 1969. In addition, it appears that NASWI is in violation of the following:

- Environmental Health and Safety Risks to Children (Executive Order)
- Safe Drinking Water Act of 1974
- Historic Preservation Act of 1966

In addition, compliance with the National Ambient Air Quality Standards is questionable.

My detailed comments are appended hereto. I look forward to a more responsible and responsive study replacing the current inadequate one.

Sincerely,



## DEIS for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex Comments

### Noise:

The DEIS states, on page ES-5, that the proposed action would have a significant impact on the noise environment as it relates to aircraft operations at Ault Field and OLF Coupeville, then it goes on to attempt to backtrack on this statement. Astonishingly, the Navy has never done on-site noise testing!

The methodology employed to analyze the noise impacts for this study is seriously, and fatally, flawed! The Navy used a DNL noise contour that averages noise levels over a 24-hour period. Unfortunately humans do not hear average noise, humans hear noise when they hear it. A 65dB noise level contour does not provide an adequate baseline to analyze impact. During FCLPs at OLF affected individuals commonly endure noise levels in excess of 110dBs. This is unacceptable!

It appears that the DNL noise contour level methodology was used as an artful deception, designed to obfuscate the actual impacts of jet noise caused by operations at OLF. The deficiencies related to the noise study are outlined in very specific detail in the August 16, 2016 letter from Port Townsend Mayor Deborah S. Stinson to Commanding officer, NASWI, and the September 1, 2016 memorandum from Ken Pickard, President COER. Further, the report prepared by Dr. Dalhgren on the public health impacts of jet noise and the noise study prepared by JGL Acoustics were both demeaned and disregarded by the preparers of this study.

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**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Resident*

3. Address \_\_\_\_\_ *Oak Harbor 98277*

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
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- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
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- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
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- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
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- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

Please do a complete study of noise generated by the Growlers. They are painfully loud.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.


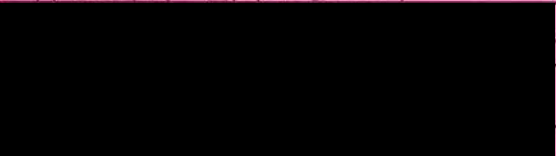
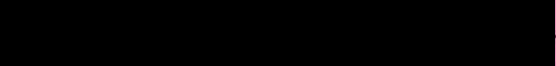


**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>

By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1.	Name	
2.	Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)	
3.	Address	<u>resident citizen</u>  <u>Coupeville, WA</u>
4.	Email	

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

### Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
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- 12.l. Community Service Impacts
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- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
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- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

All of the comments checked on this form, when realized will make living on [REDACTED] untenable. The noise alone will be unbearable. No amount of regularly used insulation could possibly quieten the sound to make living here bearable. I have lived here for 23 yrs and have borne the level of noise. But to increase it by the number of flights and by using the demonstrably much louder Growlers will be very damaging to my health, and will destroy my way of life. Please take heed of people's [REDACTED]

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Redmond, WA 98052-3304

I find it disturbing that the EIS does not include the areas where training is planned. The potential impact to our National Parks, Wilderness areas and the Lands of Native Peoples should be included in the EIS. I oppose any and all increases in the number of aircraft or the number of flights until the impact on all training areas is studied.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

2.b. Scope of the Environmental Impact Statement and Analysis Conducted

Friday Harbor, WA 98250

I am appalled that the Navy wants to expand Growler flights from Whidbey Island into a lot of Western Washington. The noise levels are HORRENDOUS. I lived in Anacortes for a time and moved, because all conversation had to stop, couldn't hear the telephone, couldn't hear the TV, until they had passed. The noise sent my whole body into chaos and craziness, and it took probably an hour, each time, before my body would reach calm again. Putting Growlers over the San Juans, into the Peninsula, over Whidbey, is so unconscionable to Washington State's environment, to its people, to its wildlife, to its pristine beauty...to so many aspects of life in this State. It has proven harmful to education, to land values, to water purity, to peace of mind, to so many things. Washington State is not in a state of war, and yet the Growlers put us there, in that kind of environment. In my opinion, the entire air force element of the Naval base needs to be moved to an area that will not so disastrously effect the well being and peaceful state of SO many beings and their water and land environment. There used to be a sign up, which I think has been taken down by now, which is as it should be, which stated that all that horrendous damaging noise was "The Sound of Freedom." That is not the sound of freedom. It is the sound of war. It is the sound of disaster, and panic, and shut-down, and damage. Please not only DO NOT increase Growler activity here in Washington, but move it all away as soon as possible to a place that will not so disastrously effect and affect the well being of peaceful, harmonious life and the environments that sustain such life. The Growlers do not sustain life. They are not meant to. They are designed for destruction. The entire base needs to be moved.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 2.n. Alternatives Considered But Eliminated
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.r. Nonauditory Health Effects

Port Townsend, WA 98368

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

1. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Port Townsend, WA 98368

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

Port Townsend, WA 98368

1.a. Thank You  
4.j. Other Reports

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data

Port Townsend, WA 98368

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports



Port Townsend, WA 98368

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Port Townsend, WA 98368

1.a. Thank You  
4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

Port Townsend, WA 98368

The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Port Townsend, WA 98368

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

Port Townsend, WA 98368

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLF night operations.

Port Townsend, WA 98368

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

Port Townsend, WA 98368

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Port Townsend, WA 98368

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.



Coupeville, WA 98239

██████████ Coupeville, WA 98239 ██████████

Subject: Draft EIS Comments Letter and Extended Personal Comments. The purpose of this letter is to express my concerns over the US Dept of The Navy's Draft EIS For EA-18 "Growler" at the NAS Whidbey Island Complex. Facts: Draft EIS seems to be within the letter of the law but not the spirit with the exception of flight patterns that are incorrect and out of date since the predominate flight path used at OLF is 32TN3 and the growlers fly "very wide" of that pattern so this certainly needs to be addressed in the noise modeling maps as this will change the contour maps west of OLF significantly. Comparing the EA-18 to the A6 is like comparing a A Siren to a Dog whistle technically on paper they could generate the same DB load but the human body will perceive the noise in a much different way. The EA-18 has a much more intrusive audio envelope that is more felt than heard. The A6 had a high pitch shriek that is dissipated with distance and going indoors. The EA-18 audio envelope is a much more intrusive noise envelope. Furthermore the EA-18 flight paths take a much more rounded and wider arc compared with the previous A6 path. The EIS does not address or acknowledge these two significant differences, but merely utilizes the generally accepted models that were developed for commercial airports with very different noise patterns. These important issues would need to be addressed before any real discussion could be had. Personal Viewpoint: As a person with a 5th generation connection to Coupeville. I choose to live here because of proximity to family not whether the Navy stays or leaves. so I am neither pro nor against expansion of OLF. The Navy has made big changes from the ways operations were done with the A6 as stated above. I personally have been surprised at the number of neighbors who have always been pro Navy that seem to have soured their viewpoints over the very different noise envelope and very different flight paths taken by the "Growlers". Oak Harbor and Northern Skagit County and their contained businesses are the primary benefactors of this expansion. Coupeville and south island are much less dependent on the military for business and most people in these Whidbey areas that I have canvassed work off island or have businesses of which only a small or very limited portion of sales is attributable to the military cohort. Asking Coupeville to take more of the "Growler" traffic is the equivalent of making Coupeville their landfill just because Oak Harbor and Skagit county don't want it in their backyard and don't want to pay for it. From my own prospective as a disabled person and a business owner I can see that this will be very harmful to my business. Up until to this point we have been able to work around the Navy's schedule at OLF Coupeville, but any increase in flights would make that unworkable for us and would require major structural upgrades to our home to allow me to continue operation. The Navy does seem have any intention offering mitigation to any one facing similar business impacting issues. As a property and a business owner (who's takes zero dollars from the local military cohort) this concerns me deeply. While I do not mind sharing the load of Growlers for the good and the Welfare of the county this needs to be a 2 way street. And I mean to affected property owners not just to local governments need to be fairly and justly compensated and mitigated in this matter without having to resort to litigation. I think that the following things would go a long way towards smoothing over a great deal of the fence sitters and former Navy supporters: Provide no cost major noise mitigation to home owners under the flight path. Particularly

- 1.a. Thank You
- 12.f. Economic Hardship and Impacts
- 12.k. Compensation to Citizens for Private Property
- 12.p. Local Differences in Economy
- 2.h. Next Steps
- 3.d. Arrivals and Departures
- 4.k. Comparison of the Prowler to the Growler

those under the modified path Between Fort Casey Rd and Engle Rd as these homes where built with less stringent noise codes. (I am sure there are other areas also affected by the larger flight paths but they are not within my purview) \* Purchase aviation easements from the areas newly affected by EA-18 flight path at OLF Coupeville.\* Provide long term property tax relief for all residents in what will be the OLF APU which is going to be at least within modified 32TN3 and 14TN3. This tax revenue can be offset from benefactor areas such as Oak Harbor and Skagit County. Provide no hassle business relief grants for mitigation and or relocation etc as deemed best by business owner.\* Purchase up as much remaining development rights on vacant land in APU and inside major noise contour as possible. to lower any further encroachment.\* \* - My understanding is that Navy does not have statutory right to provide these funds all such authorization must come directly from congress. Closing Statement: I would hope that I have conveyed both a respectful tone that seems to be lacking in this conversation and some common sense solutions. I can see this going 1 of 3 ways 1.The Navy and coordinating Governments taking a course of action similar to the suggestions above, moving forward and making most people happy and keeping the base on the island. 2. The Navy pulling up stakes and leaving in which case Oak Harbor and a Big chunk of Skagit County dies on the vine. 3. The Navy increases operations in Central Whidbey without any other consideration and then the litigation really starts flying. The Big Lawyers from Texas and Mississippi show up, the ones who don't look and cases under \$250-\$300 million and only the trial lawyers win. At least one such firm is already on the island looking for lead plaintiffs now so I would assume they smell blood in the water. This is not my first rodeo and I personally have taken a long hard look at the Navy's claim of "Res Judicata" at OLF Coupeville and do not see how they could outright win such a case and I would place strong odds they would be forced to settlement or to court which would likely end in a judgement against them. Respectfully, [REDACTED]



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED] Port Townsend WA

98368

4. E-mail \_\_\_\_\_

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

This is totally NOT O.K. - Yes it is bad for our community and for the forest. Mostly I am concerned for the animal who home you are invading with your equipment and noise and the degradation to marine species habitat. You may have won this time - BUT ~~the~~ EARTH will win HONOR EARTH!  
 Stop this Nonsense.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



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1. Name

2. Organization/Affiliation

3. Address  bit Townsend Way 98163

4. E-mail

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

I do not condone the massive increase in Aircraft Noise Pollution over island seamyam and jetterson counties due to increased flight operations at NAS whidbey. chemical pollution is another concern not only over these areas but Olympic National Park as well. Existing EIS information is much too generalized and short of depth. My vote is for No action alternative.

Please print • Additional room is provided on back

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**YOUR INPUT MATTERS**

Port Townsend, WA 98368

We strongly urge you to extend the comment period at least 45 more days regarding the Navy's Draft Environmental Impact Statement to add 36 more Growlers to NASWI and to conduct electronic warfare in the Olympic National Forest. To expect the general public to provide constructive, educated comments (something we assume is what you truly desire) on such a technically complicated issue and during the busy holiday season is poor planning at best, disingenuous at worst. Thank you for your consideration of this matter. [REDACTED]

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

Comments must be postmarked or submitted online by February 24, 2017

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
RESIDENT & BUSINESS OWNER, Whidbey Island

3. Address \_\_\_\_\_ LANGLEY WA 92260

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

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- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
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(over)

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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

The DEIS is flawed in many ways; most notably, the way sound measurements were done, and effects evaluated, bears no relationship to the real, on-the-ground effects and impacts.

The frequency of increased Growler flights will be disruptive to schoolchildren and make learning impossible.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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EA-18G Growler EIS Project Manager

2/21/2017

My wife and I attended the last Open House in Anacortes on December 8, 2016, concerning the Proposed addition to the fleet of Growlers at the Whidbey Island Air Field. We have attended several meetings and Open Houses both in Anacortes and on Whidbey Island and have commented in previous comment periods. We live in a beautiful area near the mouth of the Skagit River where we have been for over 20 years. We have loved it here. Unfortunately we are exposed to the extreme noise from low flying aircraft on their approach to NAS Whidbey, directly over our home. We are both suffering hearing loss and associated problems from the impact of these flights. The neighboring dogs are totally deaf. We attribute this wholly or at least partially to the jet noise. If we are outside we have to plug our ears to keep them from hurting or from further damage. The thought of additional Growlers flying in this space is very disheartening to us. I am attaching the previous comments we have sent in the hope they will make some sort of difference. At the last Open House however, the NAS personnel made it sound as if it was a done deal. We hope that isn't so and that additional aircraft will not be added to the Whidbey fleet. Thank you for listening to our concerns.

Sincerely

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



To: EA-18G EIS Project Manager

We recently attended the last of three Open House Scoping Meetings in Anacortes, Washington, for the upcoming Environmental Impact Statement (EIS) concerning the proposed expansion of the EA-18 Growler Operations at Navel Air Station Whidbey Island. We found the staff manning the stations to be mostly friendly and well prepared, as could be expected. Although our concerns were listened to, we came away feeling that no matter what concerns were expressed by the attendees, the Navy was going to go through with the proposed expansion.

We live to the East of Ault Field directly in line of the training flights for Touch and Go landings. As the Growlers fly over us they are low and slow on their approach to Ault Field. As one of the pilots at the open house pointed out to us, we live in one of the maximum noise areas for these flights because of the flight corrections taking place in that space. We have owned our property here on the North Fork of the Skagit River for almost 23 years. During that time we have definitely noticed a big increase in flying and noise levels in our area. We love living here most of the time. The only negative to that, and it is a huge negative, is the noise levels we are exposed to when the older Prowlers and more lately the Growlers fly over. As stated in the recent scoping meeting pamphlet "the Navy identified the Growler as quieter because scientific measurements indicated that the Growler emits less sound than the Prowler during most flight profiles. Noise levels vary depending on where you are in the flight pattern. The comprehensive noise study conducted for the 2012 EA acknowledged that the Growler is louder during arrival than the Prowler." Unfortunately, as far as our neighborhood is concerned, given that we are on the arrival path of the Growler, we experience a much louder noise level than the average level reported in your study. At times it is simply unbearable to be outside and not much better in the house. We can feel the house and windows shake as the planes pass over. We have to plug our ears as the planes fly over. This is no exaggeration. We have observed the wildlife and domestic animals cower and try to get away from the deafening level of jet noise. Conversation, talking on the phone, listening to or playing music or watching TV is impossible. My wife is a medical provider and is unable to consult with other providers or her patients when the need arises when she is at home during periods of flight training exercises. Just a few months ago we had to spend over \$2000 for hearing aids for my wife at the age of 61. She had to purchase a \$400 amplified stethoscope so that she could continue to work in her family practice clinic. Our guess was the jet noise played a part in that loss.

At the open house we had a conversation with the folks studying noise levels. They informed us that the average decibel readings, over a 24 hour period, were done using simulations and computer modeling. We don't feel that these models are accurately able to measure the real time maximum sound level experienced in our neighborhood.

We know that training is essential. Before any decisions are made, we would urge you to use actual field measurements in the affected areas of the noise level readings during different phases of flying. It is our hope that the navy will consider the concerns of all its neighbors, environmental agencies, and health organizations and not just add more planes and flights because it is convenient and provides for the economy of the area around the base. We also hope that all alternatives will be looked at including

relocating training to less populated areas.

Sincerely

[REDACTED]

[REDACTED]

Mount Vernon, WA 98273

To: EA-18G EIS Project Manager

1/4/2015

We recently attended one of the latest Open House Scoping Meetings held at Coupeville High School on October 28, 2014. We also attended the earlier meeting at the Anacortes High School. To our great disappointment, at the most recent meeting, we learned that the Navy was considering adding yet more Growler aircraft than previously mentioned in the earlier meeting. This only made us feel like our input has no real impact on your decisions. We cannot stress enough how much the noise level that these aircraft produce, which is far more than the Navy implies, adversely affects the quality of life in the area where we have lived for the past 25 years. The noise from the growlers has become unbearable to the point that we are considering selling the house we love. We sincerely hope that the comments generated from the Scoping Meetings by the residents impacted by the noise of the growlers weighs heavily in your decision on the option you choose. Rather than reiterate our concerns from the initial comment period, we are attaching that letter for your viewing.

Sincerely

██████████

██████████

Mount Vernon, WA 98273

Mount Vernon, WA 98273

EA-18G Growler EIS Project Manager My wife and I attended the last Open House in Anacortes on December 8, 2016, concerning the Proposed addition to the fleet of Growlers at the Whidbey Island Air Field. We have attended several meetings and Open Houses both in Anacortes and on Whidbey Island and have commented in previous comment periods. We live in a beautiful area near the mouth of the Skagit River where we have been for over 20 years. We have loved it here. Unfortunately we are exposed to the extreme noise from low flying aircraft on their approach to NAS Whidbey, directly over our home. We are both suffering hearing loss and associated problems from the impact of these flights. The neighboring dogs are totally deaf. We attribute this wholly or at least partially to the jet noise. If we are outside we have to plug our ears to keep them from hurting or from further damage. The thought of additional Growlers flying in this space is very disheartening to us. I am attaching the previous comments we have sent in the hope they will make some sort of difference. At the last Open House however, the NAS personnel made it sound as if it was a done deal. We hope that isn't so and that additional aircraft will not be added to the Whidbey fleet. Thank you for listening to our concerns. Sincerely [REDACTED]

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Port Angeles, WA 98362

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

In the Navy's ongoing efforts to ride roughshod over the environment on which we all depend, you have deliberately chosen your comment period to coincide with the busiest holiday time of year. If you wish to maintain any pretense of good faith, extend the comment period an additional 90 days. [REDACTED]

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 19.d. Electronic Warfare
- 2.n. Alternatives Considered But Eliminated
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

1 UNITED STATES NAVY  
2 PUBLIC MEETING  
3 FORT WORDEN STATE PARK CONFERENCE CENTER  
4 USO HALL  
5 200 BATTERY WAY  
6 PORT TOWNSEND, WASHINGTON  
7 DECEMBER 5, 2016

8  
9

10  
11

12 ENVIRONMENTAL IMPACT STATEMENT (EIS)  
13 FOR EA-18G "GROWLER" AIRFIELD OPERATIONS  
14 AT THE NAVAL AIR STATION (NAS)  
15 WHIDBEY ISLAND COMPLEX

16  
17

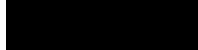
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Court Reporter: Nicole Johnson  
Olympic Court Reporting Services  
Chimacum, Washington 98325  
(360) 732-4600

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24

25

18  My concern with this whole issue has  
19 to do with the natural environment, the wildlife -- both  
20 in the sea and in the national parks -- and the forests  
21 surrounding them. I understand that this issue has been  
22 addressed in an earlier meeting and that the Navy has  
23 already issued an EIS on this subject, but that the  
24 National Forest Service has not completed their part of  
25 that deal.

1 I understand that this particular meeting of  
2 5 December, 2016, is more to do with the increase of  
3 Growler activity as it affects the community surrounding.  
4 My interest would be and my concern is that with the  
5 increase in Growler activity, that the issue be reexamined  
6 as to its effect on the quiet and the environmental  
7 impacts on the wildlife of the national parks and the  
8 surrounding forest.

9 The surrounding forest in particular, as regards  
10 to the testing of these vehicles with the antenna that  
11 they play hide and seek, that issue as to how it  
12 influences. I don't know if any of this pertains to  
13 activities of Navy in the surrounding sea or not, but if  
14 so, I'm quite concerned about that as well.

15 I'm making this statement because I want to make  
16 sure that my previous statements, which were made a couple  
17 years ago, have not gotten lost in the shuffle. I admit  
18 that I have not read all the information, but by doing  
19 this, I'm expressing my concern, and that even though  
20 Naval Air Force work has been ongoing for decades, it's  
21 the increase in activity that bothers me.

22 And I seriously question as to why a national  
23 park and the surrounding forest has to be used for these  
24 operations as opposed to some other area which is not so  
25 designated. And I guess that's about it.





# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation C.O.F.R.

3. Address [REDACTED] Coupeville 98239

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

Any <sup>of these</sup> increases in flights at OLF will result in destroying tourism for Coupeville and effectively shut down the town. I believe the Navy should build another OLF in a less populated area. Also, the Navy should have included the contamination of wells in the EIS. We now know the newest Coupeville well has a contamination level of PFOAs of 67 per trillion parts with 20 being the cutoff of safety as drinking water use

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.a. Regional Land Use and Community Character

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

As a retired teacher and witness to the disturbance of learning in Coupeville Schools, I think it is criminal the Navy can waste off children's lives as collateral damage along with the rest of us. I believe ultimately, Central Whidbey will die as a community due to the Navy jet noise.

I am one of the people who lost significant hearing to the jet noise. This was verified by my audiologist who showed me the measurements on her computer & said this sharp deep loss is due to a noise event. The only loud noise exposure I have had since buying my land is here. Your representations and documents do not support this.

I am also upset by your use of day night average to measure the noise. You use a model instead of a real noise event measurement. Even your single event measures are computer models, not actual measurement. We are affected by real time noise and it is intolerable and negatively affecting the lives of all beings in the area. No community should be treated as collateral damage when other land for FCLP are available to be built

For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic

6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Coupeville, WA 98239

1. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-whidbey Island sites to conduct flight carrier land practices (FCLP). The military has control of over 14,000,000 acres within the United States, and the Navy has failed to examine these lands for potential FCLP. I believe after our Pearl Harbor losses in WWII, the military had decided not to locate all defense weaponry in one location. Placing all Growlers for the U.S. makes a single target of NAS Whidbey. 2. THE ANNUAL DAY-NIGHT NOISE LEVEL (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. 3. The DEIS claim that the JGL noise study was "flawed" is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. 4. The DEIS misconstrued important findings of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts. 5. Much like the tobacco industry did years ago, the DEIS selectively and reprehensibly cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature. 6. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. The DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e. "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impose noise] for more than 2 days in any month"). I personally lost much of my hearing to exposure to the Navy Growlers according to my audiologist who also worked serving enlisted Navy personnel at NAS Whidbey. As a retired teacher, I had to save up funds with which to purchase hearing aids as no insurance covers this expense. I had no idea that the Navy would be permitted to expose citizens to damaging levels of noise. 7. Island County land use policies, plans, as reflected by the construction permits issue, have largely defied the Navy's 2005 AICUZ for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. I personally had no knowledge of any construction restrictions on the land where I built nor did my parents who originally purchased that land in 1983. I bought this land from them with no prior knowledge of OLF land use restrictions or information regarding jet noise. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved. Homes in these areas are currently under construction. I believe this failure has led to such a large number of residences built, that this area is no longer safe for FCLP as it is now too

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 11.d. Per- and Polyfluoroalkyl Substances
- 13.a. Environmental Justice Impacts
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

highly populated. 8. The two most dangerous aspects of flying are the approach, land, and takeoff--in other words, most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than the EA-6B (Prowler) predecessor and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes within the significant shoreline bird population. These risks cannot be mitigated other than moving the FCLPs off a suitable 21st century off-Whidbey site. We citizens should not be treated as collateral damage. 9. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise. Most of us who retire on Whidbey do so to enjoy being outdoors. We are thus denied a basic benefit of our property. 10. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment. We have not been assured that the large stockpile of this damaging fire-fighting foam will not be used again in the case of another jet crash. We know it is currently stored in the fire-fighting trucks. I am outraged that our water supply on Whidbey has been contaminated due to Navy operations. The Navy needs to reveal all test results of the wells which have been tested, whether or not they exceed the current EPA lifetime limit of 70 ppt. That is public information which needs to be included in the EIS. 11. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000 operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10 % because, as base commander Captain Nortier explained, Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected. 12. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain or suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. Personally, I lost the ability to sleep through the night after being subjected to so many night flights, often as late as 1:00 a.m. and occasionally as late as 2:30 a.m. I experience heart palpitations and great anxiety every time they flew after the extreme number of low and late flights they conducted in 2013. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. 13. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The

average understates interruption events compared with event frequency during FCLP sessions which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. As a retired teacher of 28 years, having taught K-12 including adult education, I can assure you that students in Coupeville are being deprived of a quality education under these circumstances. No matter their test scores and achievements to date, I can assure you it is less than it would have been without such damaging interruptions and high noise levels. In addition, the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior, but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed. In addition, children living near the OLFC and subjected to late night jet noise from FCLP's arrive at school without sufficient sleep and become poor learners. 14. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST COMPENSATED injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated. As I mentioned earlier, I experienced sudden strong hearing loss and tinnitus after working on my property prior to learning about this effect. 15. The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Community Service Impacts
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations
- 4.o. Classroom Learning Interference

As a citizen of Coupeville in central Whidbey Island, I believe the Navy has an obligation to explore other placements for the additional Growler jets. Placing all US Growlers in one location unnecessarily exposes our small community to unhealthy levels of noise and additional possibility of water contamination. The Navy has access to millions of acres and other bases which could accommodate these Growlers. After Pearl Harbor, I was under the impression that the military would not have a singular location for weapons of war. Placing all Growlers on Whidbey creates an unnecessary target for our enemies.

Coupeville is a historic and bucolic town which relies on tourism as its main industry. I do not believe the Navy has the right to destroy an entire community by expanding in such a small location, nor do I believe they have the right to destroy one of the most pristine environments in the Pacific Northwest. If this expansion in any form is allowed to go forward, the Navy will be driving many residents, farmers, and shopkeepers from this island, effectively turning Coupeville into an installation of the Navy. There are many 4th generation residents who fear they will have to leave this island. Additionally, many residents of nearby cities such as Seattle rely on Whidbey island for their recreation.

I also know that the fire trucks located at OLF Coupeville are currently loaded with the fire fighting foam that has contaminated our water supply. Alternative foams we have been told will be used in the future continue to have that contaminate in them, although in smaller quantities. That is an unacceptable risk to a community and our environment. I will have to have my well tested independently as the Navy has not revealed the size of the contamination plume nor the direction it is drifting.

Additionally, the extreme noise level created by the Growler flights has effectively sacrificed the education, health, and potential of a generation of our children. As a former educator, I understand the effects of 4-5 interruptions of the educational process in classrooms created by these flight operations. This is unacceptable in our country to adversely affect the health and education of citizens.

Please explore placing these additional Growlers in another Navy base.

Respectfully,

[REDACTED]  
Coupeville, WA 98239  
[REDACTED]

CINCINNATI, OH 45230

Dear Kind People, Last Spring my wife and I traveled from Ohio to spend two glorious weeks vacationing far from the noise of the madding crowd on Whidbey and Marrowstone Islands. The peace and quiet were stunning. For the sake of us tourists, and the wildlife there both on the land and in the sea, please refrain from making more noise and practice your planes elsewhere. Our sanity and their way of life deserve better. Thanks, [REDACTED] Cincinnati

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 2.n. Alternatives Considered But Eliminated
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area

Port Townsend, WA 98368

Dear Sir/Madam, I appreciate your extending the comment period to February 24, 2017. Since the Navy decided to hold all four of its public dog and pony shows (they are no longer technically 'public meetings') and produce the agency's DEIS during the holiday season, it made it difficult for the public to read, digest and assemble thoughtful comments related to the Navy's plans. The Navy's display of its version of a public process certainly does not instill confidence and trust. There are so many things wrong (and illegal) with the Navy's DEIS, it's hard to know where to begin. I am an engineer and am familiar with the Section 106 Process of the National Historic Preservation Act (NHPA) used to assess the effects of a project on historic, archaeological and cultural resources. The Navy has done little in this DEIS to comply with Section 106 review of its activities as the impacts to cultural and historic sites are not adequately considered. The Navy too narrowly defined the Area of Potential Effect (APE) for impact on cultural and historic resources. The State Historic Preservation Officer (SHPO) confirmed this in a January 9, 2017 letter to the Navy, as well as earlier communications. The SHPO commented that not only will cultural and historic properties within the limited, existing APE boundaries be adversely affected but additional portions of Whidbey Island, Camano Island, Port Townsend (containing both National Register Historic Districts and National Landmark Historic Districts) and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. I can personally attest to the noise and vibrations felt in Port Townsend when we now are subject to hours and hours of touch and go practice that supposedly only affects the area around the bases on Whidbey Island. This also includes the low-flying, often frightening "terrorizing" of Port Townsend's residents by the Navy's Growlers, particularly around periods of public comment. Part of the Section 106 process also includes consultation with the President's Advisory Council on Historic Preservation (ACHP) to consider effects and mitigation of those effects on the nation's historic/cultural resources. The Navy decided to abruptly cut off those consultations when the ACHP agreed with the SHPO and questioned the Navy's assessments. I am also concerned that actual "government to government" consultations were not adequately pursued with the numerous tribes whose cultural resources and traditions are directly affected by the jet invasion of western Washington State, particularly on the Olympic Peninsula. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the DEIS analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. The US Department of Housing and Urban Development posted noise abatement and control

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources



standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” Residents in these outlying areas, who live many miles from the Navy runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). The Navy has broken up this project into so many parts, changing from time to time the number of Growlers, flights, etc. and continues to say there is “no impact” on anything or anyone. It has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That’s more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” Segmentation like this is illegal as it intentionally keeps the public confused and overwhelmed. The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. The Navy has not measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on

a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wild lands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdestcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or

structure.” If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled “Representative Sound Levels for Growler Aircraft in Level Flight,” on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, “...but may be developed and altered based on comments received.” Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be “...identified in the Final EIS or Record of Decision.” Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy’s proposal to not allow a comment period on the Final EIS would be unlawful. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, “...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives.” According to a memo from the President’s Council on Environmental Quality (CEQ) to all federal agencies, “Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.” (<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. The Navy has exacerbated the problem by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of

an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. Pages of boilerplate language do not constitute analysis of impacts to wildlife. Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. The Navy knew about contamination in advance and avoided the subject in its DEIS. It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying for removal and destruction all legacy perfluorooctane

sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned in the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) No mention of contaminated soil is found in the DEIS. It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. New information that was not disclosed in previous Navy EISs includes flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife

that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. Thank you. Sincerely, [REDACTED]

Coupeville, WA 98239

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.h. Next Steps

post at least a 45 day comment period following release of final EIS so we can read and respond to it.

Coupeville, WA 98239

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation

Measure the sound in real time events at real locations the navy method of "averaging " noise is a useless metric, A LIE. Computer modeling is not what destroys our lives , it's the real time event not some useless average.



Coupeville, WA 98239

your noise numbers/ averaged days is a flawed, useless data point. You need to do real time and event noise measurements. Follow the park service recent noise tests protocol on Ebey's National Historic Reserve.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation

Coupeville, WA 98239

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation

collect real time noise measurements NOT computer modeling averages. Useless data points you collect with that debunked method. doesn't address real noise which is insanely intolerable.

Coupeville, WA 98239

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation

measure sound in real time and place NOT your flawed DNL averaging noise. stop this useless metric and measure real noise in real timing locations. Protect the citizens, uphold the law.

IN THE MATTER OF:  
 The Open House Public Meeting for the Draft Environmental  
 Impact Statement (EIS) for EA-18G "Growler" Airfield  
 Operations at Naval Air Station (NAS) Whidbey Island Complex

DATE TAKEN: Friday, December 9, 2016

PLACE: Coupeville High School  
 501 South Main Street  
 Commons  
 Coupeville, Washington

TIME: 4:00 p.m. to 7:00 p.m.

REPORTED BY: Mary Mejlaender, CCR No. 2056  
 Likkell & Associates  
 Court Reporters & Legal Video  
 2722 Colby Avenue  
 Suite 706  
 Everett, WA 98201  
 depos@likkellcourtreporters.com

LIKKEL & ASSOCIATES, COURT REPORTERS & LEGAL VIDEO  
 2722 Colby Avenue, Suite 706, Everett, WA, 98201

(425) 259-3330

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 7.j. Impacts on Outdoor Sports

23 (The personal identifiable information disclosure  
24 statement was read to the following commenter.)  
25 MR. [REDACTED]: All the information was read

1 clearly to me. I understand what was said and I'd like to  
2 begin.

3           The Navy is not a good neighbor. Good neighbors  
4 don't poison the well water. Good neighbors don't pollute  
5 the air with toxic jet exhaust due to the constant circling  
6 of OLF. Good neighbors don't create such an insanely  
7 intolerable noise racket at night the neighbors can't sleep.  
8 Good neighbors respect the unique natural gifts of Ebey's  
9 Reserve and the National Parks' efforts to continue good  
10 stewardship of the land.

11           The place you think you have the right to rain  
12 down hell with your noise tends to piss off the people  
13 living there, and you destroy our economy, our health, our  
14 peace and quiet. Growlers are so out of scale with student  
15 drivers practicing above our communities, kids ball fields  
16 and recreational areas, the Navy creates a dangerous  
17 situation. Get the jets off Whidbey.

18           Dear Navy, you are not welcome in central  
19 Whidbey. You destroy and degrade all that is good about  
20 Coupeville. Jet huggers, learn your history. Coupeville  
21 began as a town in 1853, OLF 1942. Stop encroaching on  
22 Coupeville. The Navy is not a good neighbor.

23   \* \* \*



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation Port Townsend Resident

3. Address [REDACTED] Port Townsend 9836

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

Option Alternative #1 w/ Scenario A sounds most appropriate for our area.

Have concerns as to the number of operations projected and the noise they will cause

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1.a. Thank You

2.m. Record of Decision/Preferred Alternative



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

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1. Name [REDACTED]

2. Organization/Affiliation [REDACTED]

3. Address [REDACTED] R-1 Tuasrad Wa 98368

4. E-mail [REDACTED]

OK 5. Please check here  if you would NOT like to be on the mailing list OK

6. Please check here  if you would like to receive a CD of the Final EIS when available

Strongly support Action Alternative 1 Scenario A

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Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS  
**YOUR INPUT MATTERS**

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative



## Draft Environmental Impact Statement Comment Form

EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by January 25, 2017

Online at: [www.whidbeyeis.com](http://www.whidbeyeis.com)

By mail at Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name [REDACTED]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
Resident
3. Address [REDACTED] Coupeville WA 98239
4. Email [REDACTED]
5. Phone [REDACTED]
6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

### Comments

Check all that concern you. For additional information see [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

- Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. Increasing OLF operations by 36 % to 475%, with up to 135 flight operations daily, will double the residential areas and increase by 10-fold the commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**
- Increased operations at OLF risk greater aquifer and well contamination. Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.
- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.

(over)

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

- The Navy did not adequately look at siting new Growler aircraft elsewhere, despite this being the #1 request from the community during the Navy's prior scoping forums.
- An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.
- Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries. All active electronic warfare jets in the US Military would be at NASWI.
- The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia, with over 100 incidents in all F/A-18 airframes in 2015 alone.
  - Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Please include any additional comments here:

*I challenge anyone with normal hearing to try to sit in their living room, eat dinner, or work in their yard when one of these aircraft fly over. Even ear muffers do not silence the roar.*

## What else you can do

1. **Get involved.** To volunteer, email us: [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
  - a. U.S. Senator Patty Murray: 206.553.5545; [www.murray.senate.gov](http://www.murray.senate.gov)
  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

## To Learn More

- ✓ To receive email updates, or to get involved, **email us** at [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at [www.whidbeyeis.com](http://www.whidbeyeis.com)

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

Stanwood, WA 98292

I am not in favor in basing additional Growlers at Whidbey NAS. I can hear the Growlers right through the walls of my north of Stanwood, day and night. State Parks in the Deception Pass area, which are some of the finest in the Nation, are virtually unusable due to noise and often, the strong smell of jet fuel. To those who say that this is all necessary for defense (or offense) I would say "How much less livable do we have to make our country in order to preserve our country?" In my opinion, it would be better to base additional Growlers elsewhere, hopefully where the population may be smaller.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

7.i. Deception Pass State Park and Other State Parks

Saanich, British Columbia V8N 3X1

I find the vibration of your aircraft very detrimental to my health, more so than the noise, especially when it goes on for hours day and night. I never know when to expect it or the extent of disruption in advance (I also work at home so no escape from it). Often leaves me feeling nauseous and unsettled. House shakes, windows rattle (not always but too often!). Being near the water there is little to absorb the sound or vibration. Appreciate your work but I feel the placement of operations so close to a heavily populated area is inappropriate.

1.a. Thank You

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

4.r. Nonauditory Health Effects

Oak Harbor, WA 98277

I have lived in the Dugualla Hts. community for 15 years and know much about plane noise. My preference for continued training is the 80 at OLF and 20 at Ault. Reason is OLF provides the best realistic training site. Another idea is to keep the planes at a higher altitude and out further from any housing community. Banking planes over housing is not called for and should cease. A citizen should not need to call and complain about this behavior as a supervising officer should keep it from happening. Thanks for the opportunity to comment. Keep em bouncing safely for all concerned!

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative
- 4.t. Noise Mitigation

Victoria , British Columbia v8x 3v7

1.a. Thank You

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

I appreciate your need to train. My concern is that the takeoff noise is akin to an earthquake starting to happen. the problem is one becomes habituated to the sound of take off one is forfeiting those few seconds to get into a safe position. Please really focus on sound reduction or a change to one that is much less "earthquake like". Thank you.

January 6, 2017

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command (NAVFAC) Atlantic  
 Attn: Code EV21/SS  
 6506 Hampton Blvd.  
 Norfolk, VA 23508

Re: Public Comment Against Draft EIS for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island

Dear Sir/Madam:

I am a resident of Clallam County Washington. I am extremely concerned about the effects of noise generated by the Electronic Attack Squadron (VAQ) 132 over the Olympic National Park and surrounding areas including populated areas. Every effort should be made to mitigate the noise to prevent injury to habitat for humans and other animals. I understand that there is no need for the pilots to be at an elevation (other than for landing and take-off) lower than ten-thousand feet, but pilots have been well below this elevation numerous times as evidenced by the flight records kept by the Whidbey NAS and by many complaints received by NAS Whidbey. Can you find a way to assure citizens that flights will not be lower than the ten-thousand foot level?

I also understand that a similar aircraft practices in Mountain Home Idaho AFB, home of the 366 Airforce wing. In fact, the 390th Electronic Combat Squadron, which I believe includes the Electronic Attack Squadron, located at Naval Air Station Whidbey Island, Wash., is assigned to the 366th Operations Group out of Mountain Home AFB. Is the duplication of such training facilities necessary?

I am sure you are aware of the December 16, 2016 incident at NAS Whidbey. The US Navy (USN) has grounded its fleet of Boeing F/A-18E/F Super Hornet and EA-18G Growler combat aircraft while it investigates the cause of a ground incident on 16 December that injured two flight-crew.

The incident at Naval Air Station (NAS) Whidbey Island in Washington state saw an EA-18G Growler from Electronic Attack Squadron (VAQ) 132 experience an unspecified "on-deck emergency" that required both crew members to be airlifted to hospital, a USN statement said.

The Olympic National Park is a National Heritage site, and citizens on the Olympic Peninsula deserve reasonable noise mitigation. I strongly urge appropriate, affective noise mitigation and high altitude only flights which the current draft EIS does not adequately address or resolve.

Sincerely,

Name: \_\_\_\_\_

Address: \_\_\_\_\_ *Port Angeles WA 98362*

cc: Hon. Derek Kilmer, U.S. Congressman, 6<sup>th</sup> CD, WA State

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.a. Purpose and Need
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.l. Points of Interest
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children

Lopez Island, WA 98261

The noise of the Growlers has become bothersome and is disrupting living on Lopez Island, WA. Please discontinue the use of this aircraft from flying over the San Juan Islands and surrounding areas. Thank you.

- 1.a. Thank You
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures



Shaw Island, WA 98286

I have been visiting the San Juan Islands since 1970 when the A3 and A6 Navy jets resided at Whidbey NAS. I have owned property in the San Juan's since 1978. I have been a full time resident of the San Juans since 1988, and have raised our family of four here. Yes, indeed the base should have been closed when the Navy wanted to years ago. The Growler infestation is magnitudes out of scale with the peaceful environment of the San Juan Islands. Many times I have been awakened by Growler Jet activity, day or night, for I am a cancer patient. In addition, I cannot converse with my family or friends on our deck by our home when the Growlers are flying overhead, the noise and rumble is deafening. The Growlers must be relocated to a more desirable location, like China Lake or another Navy Base. The Growlers are destroying our lives, and our right to peace and quiet. This quantum increase in noise intrusion must stop. The Navy's surveys and attitude has been totally disingenuous to date. The Navy is causing a taking of our personal and property rights. I respect our military and the need to have trained personnel. This is not the place for this magnum increase of decibel noise intrusion from the Growlers. Thanks for listening, please take action! Additional Comments: 1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. ACTION: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model. 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. ACTION: Noise levels should only be averaged over active flying days. 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive. ACTION: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe." 6. The Draft includes some independent noise measurements and ignores others. ACTION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument. ACTION: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA. 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

constant pilot training for safe carrier landing. ACTION: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training. 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation areas that are being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI. ACTION: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties. 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment. ACTION: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision. 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion." ACTION: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.

Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:  
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

- 1. First Name \_\_\_\_\_
- 2. Last Name \_\_\_\_\_
- 3. Organization/Affiliation \_\_\_\_\_
- 4. City, State, ZIP Lopez Island WA 9824
- 5. E-mail \_\_\_\_\_
- 6. Please check here  if you would NOT like to be on the mailing list
- 7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 7.h. San Juan Islands National Monument

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

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Coupeville, WA 98239

I have considered opening a bed and breakfast in Coupeville but due to the excessive noise of the Growlers I have decided to look at other locations for the business. I feel that the Growler flights have a negative impact on tourism and the economic development potential of central Whidbey. I have a house in Coupeville and have experienced the incredibly loud flights of the EA 18G Growlers at OLF Coupeville. The decibel level of these flights forces me to go inside in order to protect my hearing and the late night flights prevent me from falling to sleep. I am opposed to any increased flight activity over central Whidbey and would ask the Navy to consider the use of other landing fields.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 2.n. Alternatives Considered But Eliminated
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Eastsound, WA 98245

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Please eliminate the Growlers from the populated area of the Pacific Northwest and move them to an area where people won't be disturbed by them. They are ruining the quality of life for those who have to suffer through hearing them.

Eastsound, WA 98245

We are writing in regard to the proposal to continue and expand existing Growler operations at Ault Field and Outlying Landing Field Coupeville. The operations currently in existence are ruining the lives of many residents of the San Juan Islands as well as those in other nearby areas. The planes make an obscene amount of noise. We are aware of teachers having to stop their lessons until the planes are done passing over. The level of noise is so great that it is unhealthy, as corroborated by multiple scientists. Often the planes fly late into the evening, disrupting sleep, and they have been observed flying much too low. These operations have no business in a populated area. We respectfully suggest that these operations be moved to a very sparsely populated area, preferably one with no people or wildlife that will be impacted. Thank you, [REDACTED]  
[REDACTED] San Juan County

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects



Coupeville, WA 98239

EIS Whidbey Island I am a resident living adjacent to the Ledgewood Beach area, and hence extremely close to the flight path of planes entering and completing the pattern at the Outlying Field. In response to the recent community program held in Coupeville with regard to the expanded EIS conducted in respect of the training flights over Whidbey and surrounding areas, I am writing to repeat my concerns about the planned addition of 36 more F18s, and the subsequent health consequences. The only real takeaway I got from that one-sided presentation is that residents are offered one choice only: the distribution of training flights over Oak Harbor or Coupeville OLF; from equal hurt to a heavier weighting in either location. In other words, Congress has approved new F18s, the Navy at Oak Harbor is getting 35 or 36 of them, and the residents are being told what is about to happen. In short – the only real choice is to ask the Navy to place the greatest impact on the area furthest from our homes! Neighbor against neighbor. What kind of option is that? Clearly, from the perspective of anyone in the Coupeville area, the better location for the majority of flights is the Oak Harbor location! From a purely logical, non-emotional perspective, Oak Harbor still makes the most sense because it is already the center of Naval flight operations. The areas in and around NAS Whidbey are the most noise and chemical polluted already – why spread the misery further than it already is? People buy homes in that area knowing the NAS exists with all its ramifications. Coupeville is the residential and government center of Island County: surely its historic value should be preserved to the greatest extent possible, not only for the residential aspects, but also for the undeniable attraction for tourism, and hence the livelihood of many of the population. Much of Whidbey also just happens to be one of the most beautiful places in America – why must you despoil it still further? Let me reiterate that I fully understand the need for pilots to be trained and the justly warranted concern for their safety in action. With this in mind, and recognizing that there would be noise near our property during practices, we spent many days on Whidbey observing flights of the A6s that were then training, and talking to the Liaison Officer at NAS, Whidbey, about proposed future use. We subsequently signed the relevant waivers acknowledging noise, when we purchased our property. For the next few years the training continued in intense bursts at infrequent times of year, apparently keeping within the previously negotiated scope of operations (subsequently ascertained as 6,120 per year.) While unpleasant, and particularly distracting when trying to get to sleep on the post-dusk runs, the levels were pretty well as expected. Then the real problems began, first with the transition from A6s to F18s. We had previously been informed by the Liaison Officer that the expectation was that the new planes would be no more disruptive – although they were expected to generate more noise, the noise cone would be narrower, and hence limited to a much narrower flight path. These are the issues. First, although the flights are not supposed to be over land, as they pass our area, all too often the first run of the series of pattern flights passes directly overhead, putting us immediately under the greatest concentration of noise. Second, the noise of the F18s is much greater than that of the A6s; in fact, it is painful to the extent that when I'm outdoors and F18s suddenly burst on the scene, I have to remove my hearing aids to reduce the pain. While this is unpleasant for everyone, my greatest concern is for the hearing of small children who may well be impacted for a lifetime. Despite your attempts at the recent community exhibition to have doctors explain

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

that such noise, spread over a period of time, is not harmful to anyone's hearing health, this is simply an obfuscation of what happens during the periods of intense repeated noise during prolonged exercises. Where are the relevant studies for such activities? Some comparisons with major airports? Give me a break! These are not directly comparable. Where are the actual recordings made under the flight paths on Whidbey? Actuals, not computer simulations. Third, as is well established, the number of operations conducted in this location was well in excess of the total previously agreed limit, and that in the first half of the year alone. It was at this point that the lawsuit was filed, triggering the temporary cessation of flights for the remainder of 2013, and the instigation of the more limited EIS. It was bad enough that the Navy were already exceeding earlier agreement about frequency of operations. What is worse is the intention to add an additional 36 F18s and compound the problems still further. It would appear that, far from listening to the input of concerned residents, the Navy has simply thumbed its collective nose at us. This is perhaps most obvious when looking at the methods of conducting the EIS; not only is it being conducted by the Navy itself – a fine case of the fox guarding the henhouse – but, and I repeat, it is based solely on computer models. Where are the real-time measurements? The accurate recordings of noise as experienced at ground level by residents at different points in the flight path? Fourth. Now it comes to light that not only are residents subjected to overwhelming noise, damage to health and peace, and loss of their property values, but several are also being informed that their wells have been poisoned. Although it has not been established that the Navy is responsible, the finger points rather clearly in your direction. Just how many more crashes and fire fighting foam applications must happen before more wells are poisoned? You point out that the toxic chemicals have been banned from future products, but you still have existing supplies to use up. This is not good enough. If the Navy is sincere in its stated regard for the surrounding populations, please replace all existing supplies with non-toxic chemicals. In summary, I believe residents would have greater confidence in the good intentions of the Navy if the EIS was conducted by an independent third party, if the EIS was based on actual measurements rather than computer models, and if the Navy responded to our concerns rather than creating diversionary tactics and explanations.

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Oak Harbor, WA 98277

As a resident of North Whidbey I think the facts are clear that Ault Field will carry the majority of take off and landings in any of the scenario's presented with total field operations. The north end of Whidbey island has the most dense population which affects more citizens then in the more sparsely populated Central Whidbey. The North Whidbey population already feels the effects of all and various aircraft that takes off and lands at Ault Field. Another factor is Island County has mandated that the Oak Harbor area is designated to provide greater housing density then the more rural Central Whidbey. Both Ault Field and OLF are Navel Insulations created to fulfill the Navy Mission. so it is clear that the only fair scenario is #A with 20% FCLP's at Ault Field and 80% FCLP's at OLF. Thank you

**Draft Environmental Impact Statement Comment Form**

*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by January 25, 2017**

Online at: [www.whidbeyeis.com](http://www.whidbeyeis.com)

By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)

3. Address [REDACTED] *Coupeville WA 98239*

4. Email [REDACTED]

5. Phone \_\_\_\_\_

6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list  
*mail or call*

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

- Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations by 36 % to 475%, with up to 135 flight operations daily, will double the residential areas and increase by 10-fold the commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**
- Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.
- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

(over)

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.a. Regional Land Use and Community Character

- The Navy did not adequately look at siting new Growler aircraft elsewhere**, despite this being the #1 request from the community during the Navy's prior scoping forums.
- An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.**
- Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries.** All active electronic warfare jets in the US Military would be at NASWI.
- The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia**, with over 100 incidents in all F/A-18 airframes in 2015 alone. Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Please include any additional comments here:

## What else you can do

1. **Get involved.** To volunteer, email us: [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
  - a. U.S. Senator Patty Murray: 206.553.5545; [www.murray.senate.gov](http://www.murray.senate.gov)
  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larsen: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

## To Learn More

- ✓ To receive email updates, or to get involved, **email us at** [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at [www.whidbeyeis.com](http://www.whidbeyeis.com)

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

Langley, WA 98260

What's your plan for outside laborers' hearing loss? Who is going to pay the farm owners for their loss and L&I? It's not about being anti-Navy; it's about being practical, having a plan, and having logical solutions.

- 1.a. Thank You
- 12.e. Agriculture Analysis
- 12.k. Compensation to Citizens for Private Property
- 4.q. Potential Hearing Loss

Lopez Island, WA 98261

The draft EIS does not include San Juan County noise reports (collected since 2014). The EIS should include these ~6000 actual noise reports and level categories to enhance evaluation of noise pollution affecting residents living near growler flight paths. The SJC noise report data should be compared to the computer modeling results, and computer modeling results and methodology should be reevaluated, in order to match SJC noise reports. In addition, the validity of computer modeling results must be evaluated with actual field decibel measurements during all high and low altitude flight activity scenarios, throughout the year. In addition, actual field data must be conducted for flights with landing gear out, flights outside of the flight path indicated in the EIS (because it is not up-to-date), and low altitude flights – as all these scenarios frequently occur.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Lopez Island, WA 98261

EIS analysts and Navy representatives at EIS public outreach events react incredulously when told that shouting/yelling (at approximately 100-110) decibels is often required outdoors in San Juan County in order to continue communicating when a growler flies overhead. Their reaction (or lack of knowledge) that this is often the case seems to indicate the need for additional data collection to inform the EIS and subsequent decision-making. The noise impact data should be based on actual, realistic, peak scenarios, not averages.

1.a. Thank You

4.f. Noise Measurements/Modeling/On-Site Validation

4.m. Supplemental Metrics



Lopez Island, WA 98261

1.a. Thank You

3.b. Flight Tracks and Federal Aviation Administration Regulations

The EIS noise impact data should take into account that growler pilots – despite being advised to follow rules about landing gear, minimum flight altitude, and flight path – don't always follow these rules, as evident from personal observation for many years. Navy leadership has been unable to monitor and correct for their pilots' behavior. The EIS analysis should therefore assume that a certain percentage of growler flights don't conform to Navy rules that impact noise pollution (suggested percentage from personal observation: 50%), such as landing gear, minimum flight altitude, and flight path.

Lopez Island, WA 98261

The flight path map in the draft EIS is not up-to-date. Both growlers and the P3/P8 reconnaissance aircraft frequently fly FAR outside the flight paths indicated in the draft EIS. For example, on Lopez Island, they regularly fly over the school, the village, areas directly north and south of the village, approaching Lopez Island from due west. A Navy representative at an EIS public outreach event said that this is due to a "math problem" regarding number of aircraft and airfield capacity. The EIS states that all three alternatives would double current Field Carrier Landing Practices. Therefore, the EIS must correct its flight path maps and provide data on actual flight paths for the current growler contingent, and how the flight paths will expand with proposed additional growlers, and how many more people will be impacted by the flight path expansion, and how often and at what noise level. The EIS must take into account temporary runway closures or other exceptions to an ideal but unrealistic modus operandi. The EIS should base its flight path map on a complete, unedited dataset of GPS flight data.

1.a. Thank You

3.a. Aircraft Operations

3.b. Flight Tracks and Federal Aviation Administration Regulations

3.d. Arrivals and Departures

Lopez Island, WA 98261

Both growlers and the P3/P8 reconnaissance aircraft frequently fly extremely low, at an estimated altitude of 500ft to 1000ft. The P3/P8 aircraft in particular frequently flies barely above the tree-tops. Extremely low flight altitude drastically increases noise and visual impact. The EIS analysis must include flight altitudes of 500, 1000, 1500, 2000 ft, etc. and indicate noise level impacts for each altitude category. If flight regulations prohibit flying below, for example, 2000ft, then the EIS must not assume that pilots always observe this rule.

1.a. Thank You

3.b. Flight Tracks and Federal Aviation Administration Regulations

4.a. General Noise Modeling

Lopez Island, WA 98261

Both growlers and the P3/P8 reconnaissance aircraft frequently fly extremely low, at an estimated altitude of 500ft to 1000ft. The P3/P8 aircraft in particular frequently flies barely above the tree-tops. Extremely low flight altitude drastically increases noise and visual impact. The EIS analysis must include flight altitudes of 500, 1000, 1500, 2000 ft, etc. and indicate noise level impacts for each altitude category. If flight regulations prohibit flying below, for example, 2000ft, then the EIS must not assume that pilots always observe this rule.

1.a. Thank You

3.b. Flight Tracks and Federal Aviation Administration Regulations

4.a. General Noise Modeling

Lopez Island, WA 98261

1.a. Thank You  
4.t. Noise Mitigation

The draft EIS barely mentions noise mitigation measures. Discussion and impact of measures such as hush houses and jet blast deflectors should be expanded.

Lopez Island, WA 98261

- 1.a. Thank You
- 2.k. Range of Alternatives

The draft EIS does not mention decision-making criteria for selecting one alternative over another. Clear decision-making guidelines should be established.

Lopez Island, WA 98261

The draft EIS compares any increased flight activity from additional growlers to the higher flight activity of 1980s. However, the Prowlers of the 1980s did not have afterburners but the growlers of today do. Aircraft with afterburners are much louder. Therefore, this comparison should be removed.

1.a. Thank You

3.a. Aircraft Operations

3.b. Flight Tracks and Federal Aviation Administration Regulations

3.d. Arrivals and Departures

Lopez Island, WA 98261

The draft EIS should mention the low frequency vibration associated with the growler in section 3.2., Noise Associated with Aircraft Operations. It should also mention evaluations of physical and mental health impacts for low frequency vibrations – this vibration shakes the walls of my house and rattles the glasses in my cabinets 20 miles away from Ault Field. C-Weighting should be used throughout the EIS.

1.a. Thank You

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

4.r. Nonauditory Health Effects



Lopez Island, WA 98261

The draft EIS states that it is a priority for the Navy to promote the well-being of individuals in nearby communities. The EIS should state in more detail what the Navy will do to show that it is indeed a priority as additional growlers are being considered. For example, how does the Navy intend to eliminate the impact on property values, tourism, and recreation due to noise pollution? Judging from the exasperated comments in the SJC Noise Reports, the Navy is currently not doing a satisfactory job in promoting the well-being of nearby residents. What exactly would change with a potential increase in growlers?

- 1.a. Thank You
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 7.e. Impacts to Recreation from Noise/Operations

Lopez Island, WA 98261

The draft EIS says that bird populations have habituated to the noise, yet anyone observing birds, other wildlife, and pets can see that growler flyovers are disturbing to non-human species. The EIS should include pertinent studies on local wildlife noise impact to support its statement. In addition, the draft EIS does not discuss the CO2 impact of additional growlers flights. One growler emits 12.5 metric tons CO2 per hour. Washington State marine life is impacted by ocean acidification due to anthropogenic CO2 increases which in turn impacts the local shellfish industry. If CO2 emissions of additional growler flights are not included in the EIS, how will the WA State Department of Ecology be notified of the potential CO2 impact? How will the potential increase in jet/aviation fuel for the various alternatives be included in the Washington State Greenhouse Gas Inventory projections report? The EIS for assessing the impact of additional growlers should include CO2 emissions. See also the Office of the Governor Executive Order 12-07.

- 1.a. Thank You
- 10.c. Wildlife Sensory Disturbance and Habituation
- 18.b. Average Carbon Dioxide per Aircraft
- 18.d. Washington State Greenhouse Gas Goals

Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

Open House Comments

Fill in and Submit at the Open House

1. Name \_\_\_\_\_

2. Organization/Affiliation \_\_\_\_\_

3. Address \_\_\_\_\_

4. E-mail \_\_\_\_\_

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like your name/address kept private

7. Please check here  if you would like to receive a CD of the Final EIS

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered but Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

- 1. Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).
- 2. Recognize the impacts of low frequency Growler noise on health.
- 3. Incorporate San Juan County noise reports in the EIS analysis.
- 4. Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.
- 5. Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.
- 6. Commit to Mitigation Measures and timelines in the Record of Decision.
- 7. Add your own comments here:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(Continue on the back)

Fircrest, WA 98466

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN\\_122916--2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN_122916--2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental--review/noise--abatement--and--control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the

technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G--CEQ--40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS

that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible. (<https://www.serdp--estcp.org/Program--Areas/Weapons--Systems--and--Platforms/Noise--and--Emissions/Noise/WP--1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly at such low altitudes, why did the

Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it



was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned in the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical--&--Material--Emerging--Risk--Alert--for--AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly

likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]

1.a. Thank You

Port Orchard, WA 98366

When your ailing family member will be brutally frightened by the useless noise made by these war games you will regret it till the end of life that there was no need to expose anyone anything to this least needed waste of resources. Please do anything possible to stop these activities in our state.

anacortes, WA 98221

██████████ Anacortes, WA 98221 ██████████  
 ██████████ February 24, 2017 EA-18G EIS Project Manager Naval Facilities  
 Engineering Command (NAVFAC) Atlantic Attn: Code EV21/SS 6506 Hampton Blvd.  
 Norfolk, VA 23508 Dear Project Manager: These are my comments on the Draft EIS for  
 EA-18G "Growler" Airfield Operations at Naval Air Station (NAS) Whidbey Island  
 Complex as that document is presented on the whidbeyeis.com web page. I will focus my  
 initial comments on the noise matter and add additional specific comments thereafter. At  
 the outset, though, it must be kept in mind that the EIS concludes that all the proposed  
 alternatives will significantly increase the impact on surrounding communities. Given the  
 problems already encountered with noise from NAS Whidbey, the proposal cannot be  
 treated as change from a baseline of zero, but instead must be considered in light of the  
 existing problematic realities on the ground. 1. Noise. The noise issue is not adequately  
 treated in the EIS. The EIS does not address the fact that the existing noise from NAS  
 Whidbey activities is already an enormous problem. Instead, the EIS proceeds as though  
 the existing situation is a baseline against which additional noise should be compared,  
 and it therefore fails to truly examine the impact of the proposed action. A. Fundamental  
 flaws include: \* entirely ignoring the impacts on veterans who use, need, and rely on  
 quiet areas in Olympic National Park to recover from Post-Traumatic Stress Syndrome  
 and related conditions. Information is readily available on this and must be included in  
 any credible EIS; \* the technique of averaging noise over a day when in the real world the  
 noise occurs, with an anxiety producing combination of both inevitable regularity and  
 unpredictability, over one's lifetime. Contrary to what the DEIS modelling assumes,  
 tomorrow is not a brand new day for citizens who live in this noise for years; \* the  
 assumption that the effects of noise are fundamentally equal during the day and at night  
 differing only, perhaps, in degree (or that, unconscionably, the impact of regular and  
 prolonged interruption of children's sleep can be adequately evaluated based simply on  
 the number of individual children affected); \* the idea that the impacts of noise on  
 humans can be measured by averaging noise thereby attenuating analysis of the impacts  
 of sudden very loud noises; \* the assumption that a true and useful understanding of the  
 impact on citizens of loud, disturbing, often prolonged, unpredictable yet permanently  
 inevitable, noise can be gained using computer models without extensive field research  
 involving the real people, including veterans mentioned above, actually affected; and \*  
 ignoring the fact that noise associated with intermittent events such as aircraft overflight,  
 relative loudness changes that exceed a doubling are likely to be increasingly annoying  
 to people. The authors of the DEIS would discover greater annoyance among  
 surrounding communities and POIs if they measured and plotted relative loudness values  
 during flying and no flying periods. In sum, the very suggestion that it might be  
 acceptable to increase the existing noise problem by a substantial percentage reveals a  
 real lack of appreciation of the environmental impacts on your citizens of the existing  
 situation, much less the impacts of significantly increasing the problem by adopting  
 anything but the No Action Alternative. B. Inadequacy of the noise assessment  
 methodology. NOISEMAP and associated methodologies are not adequate to the task at  
 hand. It is true the U.S. DOD has used NOISEMAP in the past, but a newer better tool  
 called the Advanced Acoustic Model, was developed in 2010 to replace NOISEMAP. The

1.a. Thank You

10.a. Biological Resources Study Area

10.c. Wildlife Sensory Disturbance and Habituation

11.d. Per- and Polyfluoroalkyl Substances

13.a. Environmental Justice Impacts

18.a. Climate Change and Greenhouse Gases

18.b. Average Carbon Dioxide per Aircraft

18.d. Washington State Greenhouse Gas Goals

2.b. Scope of the Environmental Impact Statement and Analysis  
 Conducted

2.c. Compliance with the National Environmental Policy Act

2.k. Range of Alternatives

2.n. Alternatives Considered But Eliminated

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

4.f. Noise Measurements/Modeling/On-Site Validation

4.m. Supplemental Metrics

4.q. Potential Hearing Loss

4.r. Nonauditory Health Effects

7.h. San Juan Islands National Monument

DOD Strategic Environmental Research and Development Program (SERDP) found that NOISEMAP was outdated and might not be able to “provide legally defensible noise assessments of current and future aircraft operations.” Specifically, the SERDP project WP-1304, led by Principal Investigator Dr. Kenneth Plotkin of Wyle Laboratories (the same company that developed NOISEMAP) issued a final report titled “Advanced Acoustic Models for Military Aircraft Noise Propagation and Impact Assessment” in August 2010. The project summary states that “Classic Department of Defense (DOD) noise models are based on NOISEMAP technology, using linear acoustics and an integrated formulation.... The acoustic environments in the vicinity of newer aircraft such as ... the F/A-18E/F [which uses the same jet engine GE F414 as the Growlers] differ from those of most prior aircraft, with high noise levels associated with higher thrust engines. At those high levels, acoustic propagation cannot be modeled using the same simple linear theories employed in the classic noise models.... Moreover, the segmented flight path modeling approach typical of integrated noise models do not properly account for the complex operational and noise characteristics of the new aircraft.... A new aircraft noise model, the Advanced Acoustic Model (AAM), has been developed for the assessment of noise from military aircraft operations. It is a time simulation model that produces more physical realism and detail than traditional integrated model.” Given the existence of newer computer models with superior capabilities and more accurate noise assessment like AAM since 2010, the unfortunate choice of NOISEMAP has rendered the noise analysis in the DEIS scientifically inaccurate. More, there is strong criticism of data collected in different countries over many years. Hall studied community response in a single community (Toronto) to aircraft noise vs. highway noise and concluded: There is a difference between the community response to aircraft noise and to road noise when each is measured by Ldn. For the same noise level, a greater percentage of people are highly annoyed by aircraft noise. This difference in annoyance at the two sources is not constant, but increases as Ldn increases. The difference is equivalent to roughly 8 dBA at an Ldn of 55 dBA, increasing to roughly 15 dBA at an Ldn of 65 dBA. The Navy in various communications regarding aircraft operations at NAS Whidbey has stated that Ldn values of 65 dBA are of concern and values above 75 dBA are incompatible. The results of Hall and others show that these values should be adjusted downward by approximately 10 dBA for aircraft noise. If Ldn values are to be used, community annoyance will occur at 55 dBA from aircraft noise and severe community response are predicted above 65 dBA. C. Non-auditory health effects. The EIS authors state that non-auditory health effects secondary to aircraft noise and overflight are “inconclusive” (p. 338.) However, most medical professionals familiar with this issue disagree and feel that peer reviewed medical studies have confirmed many medical consequences. These include: • Startle Reaction • Loss of Control • Pediatric behavior changes • Adult psychiatric changes: anxiety, stress. “nervous breakdown” • Hypertension and increased usage of antihypertensive medications • Increased hospital admissions for cardiovascular disease • Heart attack (myocardial infarction) and stroke • Increased death rate from cardiovascular diseases • Sleep disturbances which may cause or exacerbate many of the other medical consequences • Speech and performance interference • Noise induced hearing threshold shift and hearing loss In my own experience, a large portion of affected people report feelings of stress and illness requiring medical consultation, sleep disturbances, anxiety, difficulties communicating with family members, and vibration of their houses and contents. To be adequate, the EIS must survey non-auditory health impacts. It would be reasonable to compare results in a high impact area such as OLF

Coupeville with a non-impacted area such as Bow/Edison, WA. It is probable that such a comparison would confirm health impacts from Naval aircraft operations. D. Exclusion of the San Juan Island National Monument. The Draft suggests that the lands and waters of the SJI National Monument are exempt from NEPA protection because the 2013 proclamation establishing this NCLS preserve states, "Nothing in this proclamation shall be deemed to restrict safe and efficient aircraft operations, including activities and exercises of the Armed Forces in the vicinity of the monument." Legally, this merely has the effect of preserving the status quo ante, that is, it clarifies that the creation of the National Monument does not place any additional burden on the Navy to justify its operations in the vicinity. The President did not--indeed, he did not have the power to--exempt the National Monument area from federal laws that already applied to wildlife there. Hence while the creation of the Monument did not per se give the seabirds and terrestrial animals there any greater protection from operation of military aircraft, neither did it exempt the Navy from NEPA or ESA with respect to wildlife in the Monument, such as Marbled Murrelets or marine mammals. Insofar as the Draft excludes the National Monument as a matter of law (at 3-74 and subsequently) it is inadequate under NEPA and should be reconsidered. I note that the Draft concedes that the SJI National Monument is subjected to a maximum noise level of 95 dB an estimated 372 times per year (at 3-34), hence the exclusion of this conservation area from consideration of noise impacts is plainly non-trivial. What is more, even if creation of the National Monument was not to affect "safe and efficient aircraft operations," that does not mean the impacts of those operations cannot or should not be considered in the DEIS. If operations do, in fact, have significant detrimental effects on the National Monument it might not be legally prohibitive of the proposed action. But it does not follow that the action can proceed without considering those impacts. That is a direct abandonment of NEPA's goal of fully informed decision making. E. Impacts on wildlife and fish. The DEIS at 3-15 uses A-weighted noise levels as a basis for determining the area of project impacts as well as the potential for harm. This weighting method is based on the sensitivity of human hearing in air. It is inaccurate to apply the same negative weighting factor to those animals that have greater sensitivity of hearing than humans. In terms of noise impacts on wildlife, then, the Draft underestimates effective levels of exposure. Furthermore, the DEIS is merely speculating (presuming) that species in the operational area have already adapted to existing levels of aircraft noise, i.e., they are no longer stressed or responding adversely to overflights. Having speculated that past aircraft operations have had no effect, the DEIS asks the reader to assume that raising the noise level will have no impact either. Not only is this unlikely on its face, it ignores the requirement of investigating cumulative impacts. 2. Cumulative impacts – Greenhouse Gasses. The EIS adopts an indefensible test for weighing the cumulative impacts of increased emission of GHGs from the Proposed Action. The EIS says its operative test is whether GHGs from the Action will "contribute to global warming to [a] discernable extent." Section 5.4.16, page 5-33. Requiring that damage be present to a "discernable extent" before preventive action can be taken leads to a death spiral and is not what NEPA requires of us. The agencies compiling the EIS are truly on the front lines of our effort to halt and reverse the environmental deterioration of which we are all so painfully aware but to which we seem to have such difficulty responding. NEPA is one of our primary tools for protecting the environment on which we all depend. Among innumerable other authorities, the Department of Defense has noted with great concern that we are currently experiencing climate change so critical that rises to the level of a national security issue. The

cumulative impact requirement of NEPA and the EIS process is intended to empower us to protect critical environmental facets, including the security issues, from “death by a thousand cuts.” We cannot allow our environment and attendant national security concerns to suffer that fate while all we do is produce a thousand EIS’s each of which says, “Well, this particular cut didn’t really matter so much. We knew it was a cut but we couldn’t discern its impact.” That outcome is plainly a failure to heed NEPA’s call and to meet its legal requirements. Unfortunately, by the logic of the EIS there is no limit to how many such Actions whose GHG impacts are “not discernable” will be condoned. That is not a useful or satisfactory EIS. The same problems are manifest in the EIS’s blithe observation that the “Proposed Action would only result in a small percentage of total aircraft GHG emissions in the state of Washington. Therefore, the GHG emissions from the proposed Action should not have a significant impact on Washington’s GHG emission goals.” Section 4.16.25, p. 4-295. No justification is offered for the EIS’s standard that only “significant impact[s]” are deserving of concern. And, as with the “discernable” standard discussed above, it offers no impediment to innumerable “cuts” whose cumulative impact is fatal. The EIS’s analysis is inadequate and cannot provide the basis for decision making regarding the Proposed Alternatives.

3. Hearing safety. Related to the noise analysis, I note that the Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards are not apparent in the DEIS analysis for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy’s defined “hazardous noise zone” threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

4. Environmental Justice and the real experience of noise. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by Growler noise. Simply examining Census Block Groups of people’s residence, as the DEIS does, cannot account for people’s actual experience of the noise currently generated or the increases to come from the Proposed Action. Here, again, the noise factor cannot be adequately analyzed at a desk using models and, in this instance, census data.

5. Alternative locations. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). Numerous islands in the world that host U.S. military bases exhibit the characteristics described as most necessary to effective Growler training. These must be inventoried to provide decision makers with a useful understanding of the alternatives to the Proposed Action.

6. PFAS. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS discusses these only in terms of “historical” releases that are being addressed already. It is not clear whether additional or continuing use of PFAS are contemplated in the Proposed Action. If so, their risks and the past difficulties must be evaluated. If not, a plain statement to that effect should be made and a permanent commitment to that effect put in place.

Conclusion. The DEIS is inadequate because it does not discharge its NEPA obligations. To the contrary, it fails to evaluate the real impacts to real people in their real lives and instead relies too heavily on modelling and unrealistic descriptions of the real-world manifestation of NAS noise. And it reduces the concept of cumulative effects to near meaninglessness. More, it does not reflect the fact that NAS Whidbey noise is

already an enormous problem and that previous noise analyses cannot be built upon here because they do not themselves provide adequate analysis. The DEIS is not acceptable as drafted. Thank you for this opportunity to comment.



Sequim, WA 98382

TOPIC: Delay decision about Electronic Warfare Sites near Forks I have status as a previous and continuing Communicator with USFS and U.S. Navy about the Electronic Warfare sites near Forks. I also have status as a resident of the NOP who registers Growler noise complaints on the Navy Hotline. Given new information about the number of Growler flights and about aquifer contaminants under the Navy's Outlying Field in Coupeville, I make a Citizen's Request that the USFS delay its decision on the Warfare sites until the Navy assesses contaminate damage in Coupeville and until the Navy compiles accurate overflight information. USFS should not be complicate in making decisions based upon evolving U.S. Navy information.

1.a. Thank You

17.a. Hazardous Materials and Waste Impacts

19.d. Electronic Warfare

Sequim, WA 98382

To the Navy: The impact of Growler noise over the 98382 zip code, meaning the city of Sequim WA and its environs has not been studied. The Navy should establish decibel meters at appropriate locations within the Sequim zipcode. I live within the Sequim zipcode and have been a consistent caller to the Navy Noise Hotline ( (360) 257-6665 ) whenever Growler noise from overhead flights and Growler noise from take-off and landing practice at the Coupeville field have been excessive enough to halt conversation within my house. The Navy sound studies should integrate decibel studies of the entire Growler flight path rather than be limited to decibel studies at the point of take-off and landing. Given my experience at my home located at [REDACTED] Sequim, WA 98382 and given my established log of noise complaints on file at the Navy Noise Hotline, I concur with the findings of West Coast Action Alliance and present them in full below. These findings should be respond to, item by item, before the Navy continues with its Growler flights and Electromagnetic field studies. Thank you, [REDACTED]

----- West Coast Action Alliance findings: 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable." (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources

activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal

agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant."

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third,

because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is

that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used

for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely

omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely,





## Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) **Provide written comments at today's public meeting;** (2) **Speak with the stenographer, who will record your comments;** (3) **Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or (4) **Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name

2. Organization/Affiliation

3. Address

4. E-mail

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

I LIVE IN PORT TOWNSEND, MY WIFE AND I MOVED BACK TO PORT TOWNSEND FOR THE PURE, QUIET, GRAND NATURAL SETTING AFTER I RETIRED FROM TEACHING FOR 32 YEARS.

SINCE WE MOVED BACK 3 YEARS AGO WE HEAR THE GROWLER ALMOST EVERY DAY SEVERAL TIMES IN TO THE NIGHT, SOME TIME VERY EARLY IN THE MORNING, SOME TIMES ALL DAY LONG. THIS IS IN NO WAY A GOOD THING IN OUR LIVES, AND I UNDERSTAND THIS WILL BE GETTING MUCH WORSE.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

2.e. Public Involvement Process

7.d. Recreation and Wilderness Analysis and Study Area

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THE "MEETING" AT THE FORT WARDEN  
USO WAS NOT A "MEETING",  
RESIDENTS OF THE OLYMPICS HAVE  
HAD NO VOICE IN THIS DECISION.

THE NAVY DOES NOT OWN THE  
OLYMPIC NATIONAL PARK,

THE PEOPLE OF AMERICA OWN  
THE NATIONAL PARKS

THE NAVY IS STEALING  
AND TRASHING OUR  
ENVIRONMENT.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

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Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1.a. Thank You

Port Townsend, WA 98368

I am against the addition of Navy Growlers in the Pacific North West. I hear them all of the time. There is no disput that the sound and the pollution the Growlers creat is damaging our environment.

Langley, WA 98260

1.a. Thank You  
4.t. Noise Mitigation

Either put effective MUFFLERS on the Growlers OR stop flying over Whidbey Island,  
please.

Seattle, WA 98144

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the

technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS

that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly



at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health

advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the

question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]

Olympia, WA 98507

- 1.a. Thank You
- 2.a. Purpose and Need

We do not understand why the sanctity of our environment is being sacrificed to this kind of activity. It is unnecessary and violently intrusive. Do our needs count for nothing?

Seattle, WA 98144

Endless militarism is destroying the planet. We must learn to live in peace and redirect resources away from wasteful fossil fuel consuming military machines and towards sustainable living solutions. Also, the jet noise causes PTSD, and harmful wildlife and recreational impacts in nearby communities and Olympic National Park.

- 1.a. Thank You
- 12.n. Quality of Life
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Greenbank, WA 98253

Surely the US NAVY can find a relatively unpopulated area to do their touch and goes. The sound pollution makes living or visiting or working in the area nearly impossible. Housing values are already depressed in the area and an increase in jet noise will be devastating. I believe it will lead to the eventual exodus of the population accompanied by enormous losses in everyone's net worth. Please consider the impact on the lives of those living and working in the Coupeville area.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated

Nordland, WA 98358

A Summary of the Association Between Noise and Health EXECUTIVE SUMMARY The objective of this document is to summarize recent literature exploring the health effects of noise exposure, and compare our findings to reported noise levels originating from the Naval Air Station (NAS)Whidbey Island Complex. The relationship between noise exposure and health has been studied extensively, and the body of knowledge on this topic is rapidly increasing. We described noise measurements taken on Whidbey Island and summarized literature on five of the most studied health outcomes associated with noise: noise induced hearing loss and tinnitus, annoyance, sleep disturbance,cognitive impairment, and cardiovascular disease, in addition to a discussion of susceptible populations. While we found that noise-induced hearing loss is typically not associated with aircraft noise, there is increasing evidence that noise exposure is associated with annoyance, sleep disturbance, cognitive impairment, and adverse cardiovascular outcomes. Groups that have been described as particularly susceptible to the effects of noise include: smokers, children, the elderly, shift-workers, and individuals with sleep disorders, mental disorders, and physical illnesses. There were limitations associated with this summary including gaps of knowledge related to exact exposure-response relationships and underlying pathways for some health endpoints. In addition, there have been minimal studies specific to health effects associated with military aircraft noise exposure. More research is needed to understand differences in risk attributed to susceptible groups compared to the general population. Despite these limitations, the current body of scientific literature suggests that the noise levels similar to those reported from the NAS Whidbey Island Complex pose a threat to public health. INTRODUCTION This report was written by the Washington State Department of Health at the request of the Washington State Board of Health and Island County Public Health Department to summarize recently published epidemiological literature about the health effects of noise exposure. Noise is being evaluated in response to community concerns on Whidbey Island and the surrounding area over air traffic noise levels originating from the NAS Whidbey Island Complex. These concerns are related to historical and current noise in addition to proposed increases in naval air traffic. Our specific objectives were to summarize recent literature on the most pertinent health effects of noise exposure and relate our findings to noise exposure on Whidbey Island. Noise and Health Noise is generally defined as unwanted sound. This definition of noise recognizes the psychological role of the impact of noise. Auditory effects of noise exposure, specifically noise-induced hearing loss and tinnitus, have been well-established for decades 1. Multiple non-auditory effects may be attributed to noise exposure, including: hypertension, cardiovascular disease and events, diabetes, obesity, reduced cognitive functioning, declines in performance, and birth defects 1–5. Biological mechanisms of the non-auditory effects of noise exposure require further study. Research to date indicates that adverse health effects are initiated by chronic stress and/or sleep disturbance 1,6,7. Recent studies also suggest that noise-induced annoyance is associated with a stress response, which can affect cardiovascular health 6,8,9. 2 Noise Measurements Sound is the fluctuation of pressure through a medium, such as air or water. Sound level is measured in decibels (dB) on a scale that is based on human hearing, where 0 dB is barely audible and a turbojet engine is approximately 160 dB 10. Because decibels are

- 1.a. Thank You
- 12.n. Quality of Life
- 4.a. General Noise Modeling
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests

based on a logarithmic scale, when two sounds are combined the total sound level is much less than simply adding the two sound levels together. For example, if there are two sources that each produce 80 dB of noise at a single location, the resulting sound level is 83 dB (not 160 dB). In addition to pressure differences that determine sound level, sound has varying frequencies measured in hertz (Hz) that are heard as pitch. The human ear is less sensitive to hearing extremely low and high frequencies. One way of adjusting sound levels to incorporate the varying sensitivity and perceived loudness across frequencies is to apply an A-, B- or C-weighted scale. The A-weighted scale was derived from an equal-loudness contour for pure tones 11. Studies indicate that the A-weighted scale provides a better estimate of human hearing threat than the other weightings and it is the most commonly used among human noise impact studies 10. However, there is some concern that the A-weighted scale underestimates the perceived loudness of low frequency noise<sup>11,12</sup>. While there are over 20 different metrics of sound, a few are typically used in studies of health effects. The highest sound level measured is often reported as an A-weighted Maximum Sound Level (LA<sub>max</sub>) or a Peak Sound Pressure Level (L<sub>pk</sub>), both of which may occur in less than a second. The sound exposure level (SEL) is the total energy of noise measured over a specified time period, often one second or a single noise event. Longer term measurement of noise is often reported as the Equivalent Sound Level- A-Weighted (LA<sub>eq</sub>), which is the A-weighted average sound level based on the equivalent-continuous sound level over a specified time period. The Day-Night Average Sound Level (L<sub>dn</sub> or DNL) is an average sound level over a 24-hour period that incorporates a 10-dB penalty for sound events at night. In studies that focus on sound only during the night, L<sub>night</sub> is typically used, and similarly L<sub>day</sub> is typically used for only daytime noise. Thus, the duration of sound exposure measurements can range from an instantaneous event to a year. The selection of the sound metric used in studies depends on characteristics of the noise and the type of health effect being studied. Uncertainty remains in terms of understanding the measurement of noise, such as the number of events or the peak sound level, that is most relevant for health 13. Noise from Military and Commercial Aircraft The majority of literature investigating the relationship between health effects and noise from aircraft is based on commercial aircraft rather than military aircraft 14–21. The main factors that affect ground-level noise from aircraft are: (1) the type of aircraft and engine including the thrust, flap, and airspeed management procedures, and (2) factors that affect sound propagation, such as distance to the point of concern (e.g. the receptor), topography, and weather 22. Noise from aircraft is predominately low frequency (approximately 10 to 250 Hz) 11,23. High frequency is generally defined as up to 5,000 or 10,000 Hz 11. People may perceive low frequency sounds either with their ears or by sensing vibrations 24. Different types of aircraft have different acoustic signatures, which makes it possible to distinguish noise measured from military and commercial aircraft 25. It is likely that different flight activities (e.g. takeoffs, 3 field carrier landing practice, low-flying) and aircraft types alter noise in ways that are determinants of health outcomes. However, these distinctions are not evaluated in this summary because of the paucity of published research on military aircraft noise. METHODS We described noise measurements from three publications to understand the noise levels on Whidbey Island. These data included recent measurements by JGL Acoustics Inc. 26,27 and the National Park Service Natural Resource Stewardship and Science Office 25, and modeled noise levels presented in the draft Environmental Impact Statement (EIS) prepared by the United States Department of the Navy 28 . There is an extensive body of scientific literature on noise-related health



effects. We summarized literature about commercial aircraft noise, as well as noise from other sources, because of the limited peer-reviewed literature on noise from military aircraft. Due to time constraints we primarily focused on peer-reviewed literature reviews with an emphasis on articles published since 2012. This summary includes a detailed description of noise-induced hearing loss and tinnitus, annoyance, sleep disturbance, cognitive impairment, and cardiovascular disease. These effects impact welfare, social, mental and physical health, and have been the most thoroughly investigated to date 2.

**RESULTS AND DISCUSSION** Naval Air Station Whidbey Island Complex Noise Noise levels originating from the NAS Whidbey Island Complex have recently been measured by JGL Acoustics Inc. 26,27 and the National Park Service Natural Resource Stewardship and Science Office 25. Modeled noise levels are presented in the draft Environmental Impact Statement (EIS) prepared by the United States Department of the Navy 28. There are discrepancies in reported noise levels across these three reports due, at least in part, to differences in measurement methods and sample locations. There are limitations to each approach and challenges to directly comparing the reported measurements that will not be addressed in this summary. The objective here is not to comprehensively evaluate the three existing reports, but to provide a useful reference for gauging possible noise exposure levels under various conditions on Whidbey Island. JGL Acoustics Inc. measured noise originating from military aircraft operations on May 7, 2013, at five locations in close proximity to one of two landing strips at NAS Whidbey Island Complex 26,27. Among other measures, they reported 24-hr LAeq noise measurements ranging from 64.1 dBA to 75.0 dBA, and Max LAeq ranging from 81.1 dBA to 119.2 dBA across the sampled sites. The National Park Service took noise measurements at Ebey's Landing National Historical Reserve, which is located five miles south of NAS Whidbey Island Complex 25. They took multiple measurements for ~735 continuous hours from two locations. For example, they reported Ldn levels of 73.6 dBA and 54.7 dBA at the two locations with LAmix levels of ~114 dBA and ~85 dBA. They also found that levels of LAmix 70 dBA were exceeded by 281 and 125 military aircraft events at the two locations over 31 days. The EIS estimated noise levels for the area surrounding NAS Whidbey Island Complex using NOISEMAP modeling software 28. Their models were based on multiple scenarios of predicted flight activity in the year 2021, which accounts for the proposed increases in flight activity and estimated changes in population. They estimated that in an average year 3,875 people across 7,299 acres will live within a 65 4 to 75 dBA Ldn noise contour. In addition, they estimated LAmix levels at multiple points of interest. The highest LAmix at a residential point of interest was 114 dBA with 267 annual events. The highest LAmix at a school point of interest was 94 dBA with 178 annual events. The highest LAmix at a park point of interest was 106 dBA with 267 annual events. Noise Induced Hearing Loss & Tinnitus Noise-Induced hearing loss is defined as an increase in hearing threshold level sufficient to affect daily living 4. Hearing loss has more specifically been defined as a 10 dB shift from baseline hearing involving multiple frequencies in the same ear 29. Noise-induced hearing loss can be caused by long-term exposure to steady state sound, or one-time exposure to an intense impulse sound 2. Long-term exposures cause ongoing degeneration of sensory cells in the inner ear, which are irreversible and progressive 2,30. The progression of hearing loss is also affected by the frequency, intensity, and duration of the noise exposure 31. There is some debate about the sound pressure range that can cause hearing loss. The permissible exposure limit set by the United States Occupational Safety and Health Administration (OSHA) is 90 dBA over 8 hours as a time-weighted average.

The National Institute of Occupational Safety and Health (NIOSH) recommends an exposure limit of 85 dBA for 8 hours 31,32 as a time-weighted average. Research suggests that an exposure limit of >70 dBA LAeq over a 24 hour period from environmental and leisure noise could pose a risk of hearing impairment 4. Instantaneous peak sound pressure levels of 140 dBA can cause mechanical damage to the middle and inner ear, and this level of exposure is likely applicable to occupational and environmental exposures 4. Noise-induced hearing loss is generally from exposures to higher noise frequencies ranging from 3,000 to 6,000 Hz 4,33, which are above frequencies normally associated with aircraft. However, there is potentially a risk of adverse auditory effects from exposure to low flying aircraft noise characterized by rapid noise level increases at noise levels exceeding 115 dBA 34. Hearing loss can affect cognitive performance, attention, and social interactions, and has been associated with accidents and falls 2. Tinnitus has broadly been defined as the inability to perceive silence 35; its expression, etiology, and effect on patients is highly variable 36. Tinnitus can be caused by excessive noise exposure and is sometimes associated with noise-induced hearing loss, but it may also be experienced in the absence of measurable hearing loss 35. An observed adverse effect level for noise-induced tinnitus has not been established in the literature, but protective levels for noise-induced hearing loss have been applied to tinnitus 35. Tinnitus can have a significant impact on quality of life and can cause sleep disturbance, cognitive effects, anxiety, hearing problems, irritability, and an inability to work 2. Annoyance Exposure to environmental noise causes subjective discomfort, which is referred to as noise annoyance 8,37. The relationship between noise exposure and annoyance is generally quantified by linking the results of noise annoyance surveys, summarized by the percentage of the population highly annoyed, and Ldn noise exposure estimates. Measuring a subjective outcome is complex and individual annoyance reactions to the same noise exposure can be highly variable 38. The specific wording in a questionnaire 5 and how the study is administered can influence how participants rate annoyance 39,40. Documented non-acoustic factors that affect how individuals report noise annoyance include demographics, personal, social, and situational conditions 39,41. For example, attitudes towards the noise source or perceived malfeasance related to the noise source can strongly influence survey results 42. Despite these complexities, exposure response curves have increasingly found that the degree of annoyance rises with increasing noise levels from transportation noise 35,43. Noise annoyance is one of the most prevalent effects of environmental noise and can cause feelings of anger, exhaustion, and displeasure 35,37,44. There is also evidence of a link between noise annoyance and neurologic symptoms such as headaches and difficulties concentrating 24. Multiple studies have recently analyzed the association between noise annoyance and depression. While the statistical significance of the associations reported in these studies have been inconsistent 45, there is growing evidence that noise annoyance could increase the risk of depression 45–48. There is also evidence that individuals with higher noise sensitivity are at greater risk of noise-related psychological disorders 37. Noise annoyance, and specifically the associated stress response, is frequently cited as a modifier in the association between noise and cardiovascular health 6,8,9. Sleep Disturbance Sleep disturbance is a deviation, either measured or perceived, from an individual's habitual or desired sleep behavior 49. It is characterized in several different ways including: awakenings, sleep quality, medication to control sleep, total sleep time, time spent in slow wave sleep, sleep stage changes, and arousals 49. Sleep disturbance measurement techniques include:

polysomnography (the gold standard that measures brain, eye and muscle activity), seismosomnography or actigraphy (both measure body movement), questionnaires, and push button responses 50. The effects of noise on sleep are commonly measured using field studies where participants sleep in their homes with natural noise exposures, and laboratory studies where noise is controlled and participant noise exposures are consistent 51,52. In field studies, another layer of complexity is added by the need to distinguish indoor noises from outdoor noises 51. On the other hand, typical habituation to noise may not be reflected in studies where participants sleep in a laboratory 51–53 or where sleep disturbance is predicted from exposure-response models 54. A limitation that affects both field and laboratory studies is the difficulty of distinguishing sleep disturbances that would have occurred without the noise event, referred to as spontaneous awakenings 50. Sleep is generally thought to play a role in recuperation and restoration of the body 50,55,56. There is increasing evidence that chronic sleep loss is associated with obesity, hypertension, diabetes, psychological changes, and increased mortality, as well as impairment in immune, endocrine, and cardiovascular function 49,55,57. Low levels of noise lead to minor sleep fragmentation, such as shifts to lighter sleep and movement 58. There is broad agreement that noise exposure, and specifically noise from aircraft, is related to sleep disturbance and can lead to serious impacts on physical and mental health if the disturbance is severe and frequent enough 50,58. All nine moderate to high quality studies considered in a recent review found that sleep disturbance was linked to aircraft noise events 49. The estimated degree of sleep disturbance that occurs with different levels of sound is not certain 54. For example, the indoor sound exposure level – at which 5% of the population is estimated to awaken – ranged between approximately 55 and 85 dB across four different studies that estimated exposure-response curves 50. One study estimated the effect level well above 85 dB 50.

6 Cognitive Impairment Cognitive impairment is typically measured as the ability to perform a task that is assessed with neurobehavioral tests, written questionnaires, or interviews. Daytime studies of children and adults performing the same tasks have found that the relative impact of acute noise on performance is similar between adults and children 59. In adults, there is evidence of chronic noise being associated with impaired attention and short-term memory 60,61. However, there is particular concern about impairment in children because of the importance of early learning and development, and the effects these have on subsequent adult health 13,62,63. With respect to noise exposure, more information exists for cognitive impairment in children than for other health effects. Recent research focused on cognitive impairment from chronic noise exposures in children indicates that noise does not affect all aspects of cognitive function 13. An increasing trend has emerged for an association between noise exposure in children and impaired reading skills and memory, and a less consistent association with attention 13,61. It has been postulated that noise exposure leads to communication difficulties, impaired attention, increased arousal, learned helplessness, frustration, noise annoyance, sleep disturbance, and/or psychological stress, all of which can result in impaired cognition 44. In the Road-traffic and Aircraft Noise Exposure and Children's Cognition and Health (RANCH) Study, the most comprehensive study of noise and cognitive impairment in children to date, a linear exposure-effect relationship was established between aircraft noise and decreased reading comprehension 61. Findings of the RANCH study, which incorporated adjustment for several confounding factors, indicate that reading comprehension falls below average with aircraft noise above 55 dB LAeq16 13. Further, an increase of 5 dB LAeq16 noise exposure to aircraft at school was

associated with a 2-month delay in reading age in the United Kingdom and a 1-month delay in reading age in the Netherlands 13. Cardiovascular Disease There is a growing body of literature describing the association between cardiovascular disease and noise exposure. Environmental epidemiological studies are most commonly used to investigate the relationship between environmental noise and cardiovascular health effects, and include retrospective, cohort, cross sectional, case-control, and meta-analyses. The relationship between environmental noise and cardiovascular disease is complex. This complexity has contributed to epidemiological studies reaching inconsistent conclusions related to the strength and significance of associations. There are a number of variables that potentially influence study outcomes such as source of noise 44, selection of noise metric 64, time of day 35,65, characteristics of the study population 66, and study design. The relationship between noise exposure and cardiovascular health is also often confounded by air pollution, and adjusting for this poses a challenge 67,68. Despite these complexities, recent studies have presented increasing evidence of a positive association between noise exposure and cardiovascular health effects 35,44,65,69,70. Acute noise exposure is associated with increased systolic and diastolic blood pressure, changes in heart rate, and stress hormone release 44. Long-term environmental noise exposure can affect the cardiovascular system and manifest diseases including hypertension, ischemic heart diseases, and stroke 44,64,65. For example, recent meta analyses 7 assessing exposure-response relationships between transportation noise (road traffic and aircraft) and cardiovascular effects (hypertension and ischemic heart diseases) revealed a 6-8% increase in risk per increase Ldn, with effects starting at noise levels as low as 50 dB 69,71. The Hypertension and Exposure to Noise near Airports (HYENA) cohort study 72–77 found a general positive association between aircraft noise and hypertension, but the significance of their findings varied by day versus night noise, country, and gender 66. There is also increasing evidence that nighttime noise is more relevant to cardiovascular effects than daytime noise 65, and men might be at greater risk than women from noise-related cardiovascular disease 66. Susceptible Populations Some population groups within the general public are likely at greater risk of developing health effects from noise exposure. However, there are few published studies designed to compare noise susceptibility of a particular subgroup to the general population 63. More often, studies report effects of varying noise exposure within a population that is thought to be at greater risk without comparison to another population, or cite that a group is more susceptible based on plausibility. Susceptibility may be impacted by numerous traits including behavior, individual circumstances (e.g. location of residence), physical and mental characteristics, and developmental phase. For auditory effects, smokers may represent a more susceptible population 78. Children, the elderly, shift-workers, and individuals with sleep disorders, mental disorders, and physical illnesses are often cited as being more susceptible to non-auditory effects of noise 55,56,63. • There is evidence of an association between cigarette smoking and hearing loss 78,79. Coexposures to cigarette smoke have been found to increase the risk of noise-induced hearing loss in occupational settings 1. • Children are thought to be at greater risk from the effects of noise exposure because they are still developing both physically and mentally 13,63. There is substantial evidence that noise impairs children's cognitive function 13. There are inconsistent findings reported for an association between prenatal noise exposures and low birthweight in two systematic reviews 5,80, and there is some indication that children exposed in utero to elevated noise have elevated systolic blood pressure and stress hormone levels 80. • The proposed vulnerability to noise in shift-workers, the

elderly and people with sleep disorders may occur through sleep disturbance 55,56. In shift-workers both daytime and nighttime noise pose a problem 55. Sleep patterns also change with age, and the elderly are generally more prone to waking up 81. • There is evidence that mental health status and personality traits are determinants of noise perception, which is potentially linked to sleep disturbance and subsequent health effects. For example, neuroticism has been associated with increased noise sensitivity and annoyance 60. More generally, attitude toward noise, sleep sensitivity, and personality traits seem to modify noise impacts on sleep disturbance 52. • Individuals with physical illness have been cited as a population potentially more susceptible to noise exposure 41,59,63. For instance, people with a prevalent chronic disease could be at an increased risk of heart diseases associated with noise exposure 82. Pre-existing disease has also been described as a potential effect modifier in the association between noise annoyance and ischemic heart disease, as individuals with chronic illness were more likely to report higher annoyance levels 70. 8 More research is needed to compare particularly susceptible population groups to the general population, and the degree to which these groups are more at-risk to harmful effects of noise exposure.

**CONCLUSION** The primary findings considered in this review are summarized below. • **Noise-Induced Hearing Loss and Tinnitus:** There is a risk of hearing impairment from long-term exposure to steady state noise levels greater than 85 dBA for an 8-hour period, and greater than 70 dBA LAeq for a 24-hour period at frequencies ranging from 3,000 Hz to 6,000 Hz. This type of noise exposure is generally not associated with aircraft noise. • **Annoyance:** The scientific literature provides evidence that noise exposure leads to annoyance, which causes a decrease in quality of life. While definitively quantifying annoyance and its effect on the population is challenging, there is strong evidence that feeling annoyed has negative impacts on mental health and cardiovascular endpoints. • **Sleep Disturbance:** A variety of measurement techniques have been used to study sleep disturbance. There is general agreement that noise is associated with sleep disturbance and if the disturbance is severe and frequent, it can lead to negative health consequences. • **Cognitive Impairment:** Studies of noise effects on children's cognition reveal an increasing trend that noise exposure results in impaired reading skills. One of the largest studies to-date found that reading comprehension falls below average when children are exposed to aircraft noise that is above 55 dB LAeq16 at school. • **Cardiovascular Disease:** The extent and underlying mechanisms for the relationship between noise exposure and cardiovascular health are still poorly understood. However, the scientific literature has provided increasing evidence of a positive association. • **Susceptible Populations:** Groups that have been described as particularly susceptible to the effects of noise include smokers, children, the elderly, shift-workers, and individuals with sleep disorders, mental disorders, and physical illnesses. However, more research is needed to understand differences in risk in these groups compared to the general population. The relationship between noise exposure and health has been studied extensively, and the body of knowledge on this topic is rapidly increasing. However, there are gaps of knowledge to consider. For instance, additional research is needed to thoroughly understand the specific exposure-response relationship and underlying pathways for some health endpoints. There are also complexities related to selecting the most appropriate noise measurement for assessing health outcomes. For example, the Ldn metric is commonly used to quantify aircraft noise exposure levels, yet this metric does not account for infrequent loud events, which could have impacts on health effects such as sleep disturbance 23. Different measurements might be more appropriate for specific noise

sources or health outcomes, and future work parsing out these relationships will greatly enhance our understanding of the association between specific noise characteristics and health. In general, there is increasing evidence that noise exposure, as defined from multiple sources including commercial aircraft, is associated with numerous adverse health effects. There are likely nuances associated with noise exposures specific to military aircraft that are not thoroughly understood. However, noise levels similar to those reported from NAS Whidbey Island Complex described in all recent reports 25,26,28 pose a threat to public health. 9 REFERENCES 1. Basner M, Brink M, Bristow A, et al. ICBEN review of research on the biological effects of noise 2011-2014. *Noise Health*. 2015;17(75):57-82. doi:10.4103/1463-1741.153373. 2. Basner M, Babisch W, Davis A, et al. Auditory and non-auditory effects of noise on health. *Lancet Lond Engl*. 2014;383(9925):1325-1332. doi:10.1016/S0140-6736(13)61613-X. 3. Pyko A, Eriksson C, Oftedal B, et al. Exposure to traffic noise and markers of obesity. *Occup Environ Med*. 2015;72(8):594-601. doi:10.1136/oemed-2014-102516. 4. Passchier-Vermeer W, Passchier WF. Noise exposure and public health. *Environ Health Perspect*. 2000;108 Suppl 1:123-131. 5. Ristovska G, Laszlo HE, Hansell AL. Reproductive outcomes associated with noise exposure—a systematic review of the literature. *Int J Environ Res Public Health*. 2014;11(8):7931-7952. 6. Swift H. A Review of the Literature Related to Potential Health Effects of Aircraft Noise. Partnership for Air Transportation Noise and Emissions Reduction Massachusetts Institute of Technology; 2010. 7. Babisch W. The Noise/Stress Concept, Risk Assessment and Research Needs. *Noise Health*. 2002;4(16):1-11. 8. Babisch W, Pershagen G, Selander J, et al. Noise annoyance—a modifier of the association between noise level and cardiovascular health? *Sci Total Environ*. 2013;452-453:50-57. doi:10.1016/j.scitotenv.2013.02.034. 9. Ndrepepa A, Twardella D. Relationship between noise annoyance from road traffic noise and cardiovascular diseases: a meta-analysis. *Noise Health*. 2011;13(52):251. 10. Earshen JJ. Sound Measurement: Instrumentation and Noise Descriptors. In: *The Noise Manual*. fifth. American Industrial Hygiene Association; 2000. 11. Salomons EM, Janssen SA. Practical ranges of loudness levels of various types of environmental noise, including traffic noise, aircraft noise, and industrial noise. *Int J Environ Res Public Health*. 2011;8(6):1847-1864. doi:10.3390/ijerph8061847. 12. Leventhall H. Low frequency noise and annoyance. *Noise Health*. 2004;6(23):59. 13. Stansfeld S, Clark C. Health Effects of Noise Exposure in Children. *Curr Environ Health Rep*. 2015;2(2):171-178. doi:10.1007/s40572-015-0044-1. 14. Basner M, Muller U, Elmenhorst E-M. Single and combined effects of air, road, and rail traffic noise on sleep and recuperation. *Sleep*. 2011;34(1):11-23. 15. Holt JB, Zhang X, Sizov N, Croft JB. Airport noise and self-reported sleep insufficiency, United States, 2008 and 2009. *Prev Chronic Dis*. 2015;12:E49. doi:10.5888/pcd12.140551. 16. Kwak KM, Ju Y-S, Kwon Y-J, et al. The effect of aircraft noise on sleep disturbance among the residents near a civilian airport: a cross-sectional study. *Ann Occup Environ Med*. 2016;28(1):38. doi:10.1186/s40557-016-0123-2. 17. Tetreault L-F, Plante C, Perron S, Goudreau S, King N, Smargiassi A. Risk assessment of aircraft noise on sleep in Montreal. *Can J Public Health Rev Can Sante Publique*. 2012;103(4):e293-296. 18. Ragetti MS, Goudreau S, Plante C, Perron S, Fournier M, Smargiassi A. Annoyance from Road Traffic, Trains, Airplanes and from Total Environmental Noise Levels. *Int J Environ Res Public Health*. 2015;13(1). doi:10.3390/ijerph13010090. 19. Seabi J. An epidemiological prospective study of children's health and annoyance reactions to aircraft noise exposure in South Africa. *Int J Environ Res Public Health*. 2013;10(7):2760-2777.

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- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 4.t. Noise Mitigation

Alternatives to increasing Growler operations at the Coupeville OLF should be fully addressed in the EIS. The discussion should include consideration of the following:

- The “No Action” alternative in the DEIS was dismissed as not meeting the Navy’s mission objectives, without a full and objective evaluation of alternatives. This is in violation of NEPA requirements. By not considering viable alternatives that could meet the Navy’s mission without increasing operations at OLF Coupeville the DEIS appears to justify a predetermined decision.
- Other landing strips in the region were dismissed as not viable for reasons including not meeting Navy safety standards for OLF’s. This evaluation neglected the fact that OLF Coupeville, itself, does not meet Navy OLF standards.
- Detachment training options, at other military air stations that meet standards for FCLP training. Such detachment training is presently being conducted for squadrons from NASWI. Growler noise mitigation and abatement methods, operations and techniques should be thoroughly considered in the EIS. The DEIS discusses aircrew compliance and performance of policy, procedures, course rules, “good common sense”, and “prudent airmanship techniques” (pg 3-30) as established methods to minimize noise impacts. Additionally, “NAS Whidbey Island has historically worked with elected officials from surrounding communities to best minimize impacts where practicable, including not flying at the OLF on weekends and minimizing flight activity during major school testing dates and major community events.”
- Technical modifications to the Growler for noise abatement should be discussed.
- Moving some of the OLF FCLP training operations to other base locations in squadron detachment deployments should be discussed.
- The historical precedent to not fly at the OLF on weekends, etc. should clearly be stated as a voluntary Navy guideline and not compulsory. I.E. Growlers may be scheduled to fly at the OLF whenever the NASWI command determines it is required for the mission. OLF operations are misrepresented as historically normal in Section 1.4. Section 4.1.2.1 misstates that the proposed action “represents a level of operation similar to historic levels of operations experienced over the life of the airfield”. The graph of Previous Airfield Operations for Ault Field and OLF Coupeville on page 1-6 shows that from 1976 through 2015 OLF Coupeville experienced an average of approximately 13,200 operations per year. A more representational average would be for the 18 years since the A-6 Intruder stopped flying in 1997, which is approximately 5,500 operations per year. The proposed increase of 29,000 operations under Alternative A would be a total of approximately 34,500 operations per year. At no time in the history of OLF Coupeville has the number of operations been at the proposed level under this Alternative. This action would be, in fact, an increase of approximately 530% over the average operations since 1997. The proposed increase of 2,700 operations under Alternative C would be a total of 8,200 operations per year. This would represent a 49% increase over the historical average of FCLP operation at OLF Coupeville since 1997. Thus, the EIS should state that, under any scenario, the proposed action represents a significant change in the number of operations at OLF Coupeville. Thank you.

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Noise estimates detailed in the DEIS are based solely on inaccurate modeling that shares little relationship to actual measured ground-level noise impacts. The National Park Service, which oversees Ebey's Landing National Historical Reserve, measured actual aircraft noise within the Reserve boundaries over a one-month period in 2015 and determined that the park has the highest man-made noise of any national park in the contiguous 48 states. The noise measurements observed exceed the Navy's simulated noise estimates used in the EIS by 20–30 dB, which is a factor 10 to 100 on a logarithmic scale. Since noise is a large component of this project's impact, it is imperative that the final EIS include accurate, exhaustive and actual sound data. An example of the failure of the DEIS sound models to accurately assess the impact is the fact that Marrowstone Island was not included in the impact area, despite the fact that we clearly hear and are affected by the current activity of the AE-18Gs. I am suggesting that the failure to include Jefferson County's Marrowstone Island in the DEIS is a critical fail on the part of the project assessment. Despite the noise modeling's suggestion that we are not in an area of impact, my personal experience of hearing long hours of low-frequency noise from Growler touch-n-go training at OLF Coupeville indicates otherwise. I hope this oversight can be corrected in the final EIS and that a fair comment period can be added to that document of at least 45 days so that those of us who have yet to be assessed can have our chance to be part of the public process. Thank you for your consideration.

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports
- 4.l. Points of Interest

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1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The Draft Environmental Impact Statement (DEIS) fails to address the potential effects of sleep disturbance due to Growler training, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...”. The EA-18G has a noise signature with elevated low frequencies. According to the AMA and World Health Organization, repeated exposure to high sound levels at these frequencies is detrimental to long term human health. Sleep disturbance can result in serious physical symptoms such as cognitive impairment, impaired immune system, short-term memory loss, adverse birth outcomes, risk of heart disease, risk of diabetes and lack of sleep. The DEIS should clearly address the impacts of sleep disturbance on residences affected by Growler night operations. I can personally attest to experiencing these effects from the training that is currently occurring at OLF Coupeville. I would like to see this impact assessed thoroughly in the final EIS.

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The noise modeling used in the DEIS is not appropriate for and representative of noise made by Growlers. • DoD's Strategic Environmental Research and Development Program (SERDP) found NOISEMAP ver 7.2 to be outdated and possibly not able to provide "legally defensible aircraft noise assessments of current and future aircraft operations". The modeling program was developed to assess civilian airport noise. The noise evaluation model used in the EIS should be appropriate to evaluate Growler noise on the surrounding community. • The Naval Research Advisory Committee has acknowledged that variations in noise from tactical aircraft measurement standards are not addressed in standards for commercial aircraft, and that there are no standards for acquiring near-field aircraft noise data. The EIS evaluation should account for variations in noise measured from Growlers compared to commercial aircraft. • Noise averaging (Ldn) is inappropriate for Growler FCLP flights at OLF Coupeville, which occur sporadically. Studies by Borsky and Stephens show that maximum dBA readings are better indicators of community annoyance than Ldn. Generally frequent maximum sounds of 70 dBA or greater correlate in a linear fashion with community annoyance. The Coupeville community regularly experiences maximum noise exceeding 90 dBA, often exceeding 100 dBA, near and around the OLF flight path. The EIS should show maximum noise contours based on this metric. a) Borsky, PN: Integration of Multiple Aircraft Noise Exposure Over time by Residents Living Near US Air Force Bases, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1049-1060, 1983. b) Stephens, DG, Powell, CA: Human Response to Aircraft and Other Noise Events, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1061-1072, 1983. • The noise model and DEIS doesn't sufficiently assess the physical and mental harm, annoyance, disturbance to life and business, childhood learning, economy, tourism from noise. • Actual noise measurements have not been made by the Navy. Actual peak noise measurements should be made for the EIS, at several more POI's than identified in the DEIS. Individual sound measurements made by the National Park Service and others in the Central Whidbey community show noise levels far in excess of that predicted by DEIS modeling. • OSHA maximum noise exposure limits are 110 dB for 30 min per day, or 115 dB for 15 min per day (slow response). Growler operations at the OLF have been measured exceeding these sound levels at several locations, including my home and adjacent business, and at Rhododendron Park. Thus, the proposed action may exceed OSHA guidelines. The EIS should evaluate noise exposure based on OSHA guidelines, and state that OSHA noise exposure limits may be exceeded. • Washington State law (WAC 296-817-20025) requires that employers in the State post warning signs in areas where noise levels will exceed 115 dB. The EIS should state that the Navy will make public notice, and request local jurisdictions to post warning signs, in public areas where noise levels exceed 115 dB. Thank you.

- 1.a. Thank You
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation

Nordland, WA 98358

1.a. Thank You  
4.j. Other Reports

The EIS should fully discuss the 2016 National Park Service (NPS) sound monitoring report in Ebey's Landing National Historic Reserve (ELNHR), as compared to the Day-Night Average Sound Level modeling method used (DEIS, pg 1-23). The actual sound measurements made in the NPS report suggest that the noise predicted by the modeling used in the DEIS could be dramatically under estimated.

Nordland, WA 98358

I grew up on an island in the Salish Sea and lived for many years with tolerance and support for the Navy's activities at NAS Whidbey. However the arrival of the Growler training has changed the noise impact profile so enormously that I no longer feel we are coexisting, or our concerns are even being heard by our longtime neighbors at NAS Whidbey Island. Growlers are not Prowlers by any stretch of the imagination. I live on Marrowstone Island, and my home is approximately seven miles from OLF Coupeville. The Growler touch-and-go training at OLF Coupeville as it currently exists impacts us with its noise, as well as the frequent fly overs along our shoreline by the planes. Despite this current impact, our island is not even considered in the draft EIS issued by the Navy this past December. When I spoke with Navy representatives at the Public Open House held in December 2016 at Fort Warden State Park in Port Townsend I was told that the noise modeling performed for the DEIS indicated we didn't hear the planes. That couldn't be farther from the truth. We hear them very clearly at our home, and both my husband and I have lost hours of sleep already from the late night touch-n-go trainings at OLF Coupeville. I run a vacation retreat business, which draws clients from all over the country to experience the quiet and natural solitude we offer. Our business was disrupted last summer (2016) , and has already been seriously impacted by Growler noise. Long-time clients, many of them clergy members who come here on annual retreat, were disturbed by the Growler noise last summer.....in particular the long hours of low frequency noise from the touch-and-go practice at OLF Coupeville. My repeat bookings for this coming summer are already down, and I am seriously concerned that the additional flights being proposed will not only kill my retreat business, but also make my quality of life here on Marrowstone Island untenable. It will truly be a sad day when the Salish Sea region, a treasured and very special natural area that millions enjoy, is changed forever by the poor choice of bringing noise-damaging aircraft to this area instead of distributing them to more appropriate, low-density geographic areas....or re-designing them to drastically decrease their noise profile. In addition to commenting on this project here, I am asking my elected officials to help secure a more balanced and less-impactful solution to protect both our country's security needs as well as the health needs of its citizens. Careful attention to the concerns being raised by citizens living in this geographic area will help the Navy maintain a positive image and will help maintain support for its efforts. Ignoring us and our concerns will only erode that support. Thank you.

- 1.a. Thank You
- 12.f. Economic Hardship and Impacts
- 2.e. Public Involvement Process
- 2.n. Alternatives Considered But Eliminated
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.l. Points of Interest
- 4.p. Sleep Disturbance
- 4.t. Noise Mitigation

1.a. Thank You

Oak Harbor, WA 98277

being a retired sailor I have been on Whidbey Island for over 40 years raised 2 kids and now Grandkids, without the Navy we would be in pretty bad shape, keep up the good work and you have my families 100% support



1.a. Thank You

Oak Harbor, WA 98277

the OLF is an essential tool in the Navy's arsenal to keep our pilots safe and up to snuff on their CQ.'s and need to be able to practice that in the best scenario as possible

1.a. Thank You

Oak Harbor, WA 98277

the OLF is a vital training facility and needs to remain open I have been living here since 1973 when the Navy was nice enough to send me here and the flying we did in those times was WAY more than what they do now

January 6, 2017

EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

Re: Public Comment Against Draft EIS for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island

Dear Sir/Madam:

I am a resident of Clallam County Washington. I am extremely concerned about the effects of noise generated by the Electronic Attack Squadron (VAQ) 132 over the Olympic National Park and surrounding areas including populated areas. Every effort should be made to mitigate the noise to prevent injury to habitat for humans and other animals. I understand that there is no need for the pilots to be at an elevation (other than for landing and take-off) lower than ten-thousand feet, but pilots have been well below this elevation numerous times as evidenced by the flight records kept by the Whidbey NAS and by many complaints received by NAS Whidbey. Can you find a way to assure citizens that flights will not be lower than the ten-thousand foot level?

I also understand that a similar aircraft practices in Mountain Home Idaho AFB, home of the 366 Airforce wing. In fact, the 390th Electronic Combat Squadron, which I believe includes the Electronic Attack Squadron, located at Naval Air Station Whidbey Island, Wash., is assigned to the 366th Operations Group out of Mountain Home AFB. Is the duplication of such training facilities necessary?

I am sure you are aware of the December 16, 2016 incident at NAS Whidbey. The US Navy (USN) has grounded its fleet of Boeing F/A-18E/F Super Hornet and EA-18G Growler combat aircraft while it investigates the cause of a ground incident on 16 December that injured two flight-crew.

The incident at Naval Air Station (NAS) Whidbey Island in Washington state saw an EA-18G Growler from Electronic Attack Squadron (VAQ) 132 experience an unspecified "on-deck emergency" that required both crew members to be airlifted to hospital, a USN statement said.

The Olympic National Park is a National Heritage site, and citizens on the Olympic Peninsula deserve reasonable noise mitigation. I strongly urge appropriate, affective noise mitigation and high altitude only flights which the current draft EIS does not adequately address or resolve.

Sincerely, *About 7 months ago near Ketchikan my wife's nephew, starting, was killed when a marine F18 failed catastrophically. He was an excellent pilot/trainer.*

Name: [Redacted]  
Address: *Port Angeles WA 98363*

cc: Hon. Derek Kilmer, U.S. Congressman, 6<sup>th</sup> CD, WA State

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.a. Purpose and Need
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.l. Points of Interest
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville

Grand Rapids, MI 49503

1.a. Thank You

7.g. Ebey's Landing National Historical Reserve

The Navy should not be allowed to use any of our National Parks for any training or research that disturbs any inhabitant or visitor from the full enjoyment and appreciation of the undisturbed natural environment!

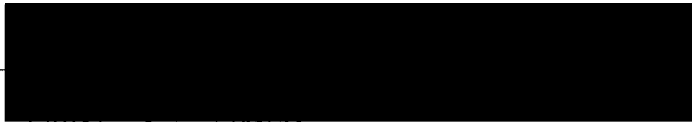
Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name



2. Last Name

3. Organization/Affiliation

Quiet Skies

4. City, State, ZIP

Lopez Island WA 98261

5. E-mail



6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

## Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

As to health affects, we have health problems that are worsened by stress heart and cancer - Our heart rates soar when touch + go (CLP) is directly over our house.

Seattle, WA 98107

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare

No War Games / Military Activities / Military Presence on Olympic Peninsula



Lopez Island, WA 98261

Comments I feel so discouraged when I want to take a walk on the south end of Lopez and you are "running up jet engines" and the roar is ruining any chances of a nature walk. I seems this happens often. I came to lopez 40 years ago and the quiet that drew me here is being torn apart by your jet practice. Take it to the desert areas. 1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. ACTION: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model.

1.a. Thank You

12.n. Quality of Life

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

4.f. Noise Measurements/Modeling/On-Site Validation

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations


**Draft Environmental Impact Statement Comment Form**

*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

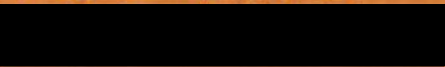
**Comments must be postmarked or submitted online by January 25, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>

By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard,  
Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name 

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
CITIZEN & RESIDENT

3. Address  COUPEVILLE WA  
98239

4. Email \_\_\_\_\_

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

- Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. Increasing OLF operations to up to 35,000 per year (135 flight operations daily) ,will dramatically increase the residential and commercial areas impacted by noise. This is a burden greater than the Coupeville/Central Whidbey community can bear.
- Increased operations at OLF risk greater aquifer and well contamination. Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. In 2016 over 10% of all private wells tested were found contaminated above the EPA standard . The extent full of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.

(over)

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.a. Regional Land Use and Community Character

- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.

Please include any additional comments here:

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

### What else you can do

1. **Get involved.** To volunteer, email us:  
[coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
  - a. U.S. Senator Patty Murray: 206.553.5545;  
[www.murray.senate.gov](http://www.murray.senate.gov)
  - b. U.S. Senator Maria Cantwell: 425.303.0114;  
[www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larsen: 800.652.1385;  
[rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

### To Learn More

- ✓ To receive email updates, or to get involved, **email us** at [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at [www.whidbeyeis.com](http://www.whidbeyeis.com)

Anacortes, WA 98221

As a resident of Anacortes, and given only the three choices mentioned in the EIS I prefer that 80% of the Field Carrier Landing Practice flights (FCLP) occur at the Coupeville runway. It seems relevant to consider population density under likely flight paths. It also seems relevant to distribute noise and pollution and safety concerns between the regions communities. Of further benefit, would be a significant effort toward reducing noise events to distinct periods of time at reasonable hours of the day and informing the public thoroughly (in advance) of proposed activities. Similar to what is attempted at Naval Air Station Patuxant River (MD) [http://www.somdnews.com/breaking/pax-river-issues-noise-advisory/article\\_a5c4e6c8-3932-5f4d-bf17-f7f0a669a0d6.html](http://www.somdnews.com/breaking/pax-river-issues-noise-advisory/article_a5c4e6c8-3932-5f4d-bf17-f7f0a669a0d6.html) . Single event noise levels are much greater from Growlers than from commercial aircraft, as measured at the airport-to-private adjacent property interface. Hearing loss is a function of sound intensity times duration. DNL sound measurement does not take into account hearing loss from short duration, intense sound levels experienced on private property adjacent to NASW boundaries. Further, the rural community surrounding the two NASW airfields has a very quiet ambient noise level...27 to 35db. This low figure decreases the Day-Night-Average (DNL), making comparisons to commercial airports in noisy ambient urban environments invalid. Extreme, sudden, or long lasting noise levels causes human health problems per modern medical science. Please defend the Navy's medical science to the contrary by analyzing conflicting data in detail. This is a complex enough issue to warrant a Scientific Evidence Review or meta-analysis of existing research, conducted by a third party. Some aspects of noise are unavoidable. As a result, I ask that the Navy consider another option not mentioned within the Draft EIS which could allow P3, P8A, and other air traffic to continue at Ault Field except all EA-18G FCLP flights would occur at some other existing training facility. As communities in the northern Puget Sound expand and diversify, the challenges related to noise, crash risk, and pollution will only intensify. Whidbey aircraft already train in similar locations in eastern WA that would not be as likely to see significant population growth nor as much impact on the environment.

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.t. Noise Mitigation

Oak Harbor, WA 98277

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative

This DEIS proposal offers three concentrations of Growler flights - 80% / 20%, 50% / 50%, and 20% / 80%. I offer two comments for your consideration: 1) As an Oak Harbor resident, and given only these three choices, of course I prefer that 80% of the Field Carrier Landing Practice flights (FCLP) occur at the Coupeville runway. Remember, for each Growler that flies Coupeville, it must take off and land at Ault Field passing over Oak Harbor on route. So, even the 80% Coupeville and 20% Oak Harbor option has a heavy impact upon the overflight noise, pollution and safety of Oak Harbor. And consider too that maintenance noise and pollution, P3 flights and P8A flights, as well as other aircraft, all originate and end at Ault Field creating more noise, pollution and safety concerns above and beyond FCLP flights. The Navy states that Coupeville is the best FCLP airfield for practice. It is also the best to fairly distribute noise and pollution and safety concerns between the two communities of Coupeville and Oak Harbor. Given these three options, I prefer 80% Coupeville and 20% Oak Harbor to serve the Navy with your preference, and to fairly distribute all noise, pollution and safety issues between the two communities. 2) But there is a fourth option that I have not seen offered with the DEIS: Why not? This fourth option would allow P3, P8A, and other air traffic to continue at Ault Field except all EA-18G FCLP flights would occur at some other existing training facility. This other facility would be in an area with lots of government owned land and few people. Most Growler aircraft would remain at this remote airfield unless returning to Ault Field for maintenance (at a state-of-the-art, sound attenuating maintenance facility). Once a week, Growler trainees would be flown in mass (perhaps in a P8A) to this FCLP remote airfield and returned to Oak Harbor at the end of the week, when FCLP is completed for that group. Navy families could remain housed near Ault Field. The Coupeville airfield could remain Navy-owned for those special occasions when FCLP use there was necessary (like during wartime perhaps). Facilities at this remote FCLP airfield would be minimal. Beside the runway and control tower that already exist, some bachelor housing and a cafeteria would be needed, as well as some briefing and office space. All this is likely already available at the remote base. Certainly this would add some transportation cost to training, but it would improve the noise, pollution and safety impact upon the greater population around Ault Field. Housing many Growler aircraft at a remote airfield would also decrease vulnerability from our enemy for both Ault Field and the remote Growler aircraft. Has the Navy considered this? I have not seen this option, or anything like it. Please do consider this option with your final EIS.

Oak Harbor, WA 98277

Please fly at FAA required altitude and not below (1,000 feet above any obstacle within a 2000 foot radius) or higher. The incident sound intensity on the ground decreases by 75% for every doubling of altitude. Since noise is an issue for many of your community neighbors, why not fly higher and over water, if only for good public relations? Retract landing gear to fly clean until on a final landing approach. Fly smoothly, stop goosing the throttle. It wastes fuel, increases pollution, and it's noisier. I live about 6 miles from the Ault Field runway. Occasionally a P3 or P18-A Growler aircraft passes over my home far below FAA altitude requirements. It is not only a matter of noise and safety, it's about public relations. Pilots should be trained to respect FAA flight altitude requirements, and should be disciplined if they are violated. Is the Navy above the rules others must follow? You may be, but good public relations and safety concerns still dictates FAA compliance.

1.a. Thank You

3.b. Flight Tracks and Federal Aviation Administration Regulations

4.t. Noise Mitigation



Oak Harbor, WA 98277

1.a. Thank You  
12.n. Quality of Life  
4.t. Noise Mitigation

Engine testing at Ault field should be done in a state-of-the-art sound attenuating facility, and for no longer than 4 hours per day duration, during the nine-to-five hours Monday through Friday. I live 7 miles from the existing facility although noise generated is not at a high enough level to cause hearing damage, at that 7 mile distance, the constant drone of noise off / on for hours and hours, and on into the night, is very annoying. Bad for public relations and much worse yet for those living close by.

Oak Harbor, WA 98277

Please disclose justification for the DNL, day-night averaging system for measuring ground-incident sound levels from Navy aircraft overflights. The following characteristics of this measuring methodology overlook the following: please justify the Navy's apparent lack of consideration: 1. The rural community surrounding the two NASW airfields has a very quiet ambient noise level...27 to 35db. This low figure decreases the DNL, making comparisons to commercial airports in noisy ambient urban environments invalid. 2. Commercial airports have a more consistent noise level day and night. NASW does not. Therefore the DNL averaging system might be more applicable to the commercial airport model than to NASW. 3. Single event noise levels are much greater from Growlers than from commercial aircraft, as measured at the airport-to-private adjacent property interface. Hearing loss is a function of sound intensity times duration. DNL sound measurement does not take into account hearing loss from short duration, intense sound levels experienced on private property adjacent to NASW boundaries. 4. The Navy provides hearing protection for personnel on-base that work in a quieter environment than some private citizens off-base. Why? 5. The Navy produces sound levels on private land that exceeds OSHA permitted standards. How can you justify? 6. Private property values are reduced due to Navy aircraft induced high sound levels. Why does the Navy not compensate private land owners so encumbered? 7. Extreme, sudden, or long lasting noise levels causes human health problems per modern medical science. Please defend the Navy's medical science to the contrary by analyzing conflicting data in detail.

- 1.a. Thank You
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects



Oak Harbor, WA 98277

Please disclose actual Navy aircraft flight tracings for each week, online. Include altitude flown and type of aircraft. Graphically convey this information of a map that includes a 25-mile radius from NASW runways. Allow map overlays to convey this real world flight pattern and density clearly. This information could be used in real property sales, and to inform property owners of their exposure risk. This data could be used by the Navy to compensate property owners for noise encumbrance. This data could be used to confirm Navy activities.

1.a. Thank You

12.k. Compensation to Citizens for Private Property

3.a. Aircraft Operations

Oak Harbor, WA 98277

Please disclose justification for the DNL, day-night averaging system for measuring ground-incident sound levels from Navy aircraft overflights. The following characteristics of this measuring methodology overlook the following: please justify the Navy's apparent lack of consideration: 1. The rural community surrounding the two NASW airfields has a very quiet ambient noise level...27 to 35db. This low figure decreases the DNL, making comparisons to commercial airports in noisy ambient urban environments invalid. 2. Commercial airports have a consistent noise level day and night. NASW does not. Therefore the DNL averaging system is more applicable to the commercial airport model than to NASW. 3. Single event noise levels are much greater from Growlers than from commercial aircraft, as measured at the airport-to-private adjacent property interface. Hearing loss is a function of sound intensity times duration. DNL sound measurement does not take into account hearing loss from short duration, intense sound levels experienced on private property adjacent to NASW boundaries. 4. The Navy provides hearing protection for personnel on-base that work in a quieter environment than some private citizens off-base. Why. 5. The Navy produces sound levels on private land that exceeds OSHA permitted standards. How can you justify? 6. Private property values are reduced due to Navy aircraft induced high sound levels. Why does the Navy not compensate private land owners so encumbered? 7. Extreme, sudden, or long lasting noise levels causes human health problems per modern medical science. Please defend the Navy's medical science to the contrary by analyzing conflicting data in detail.

- 1.a. Thank You
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Oak Harbor, WA 98277

Fuel dumping: I would like to know about all forms of Navy hydrocarbon fuel vapor emissions. That includes evaporative emission control for NASW fuel storage, fixed to or in the ground, as well as in aircraft and vehicle storage tanks. That includes fuel dumping in emergencies from aircraft. Compare to evap emissions on Whidbey Island without the Navy's contribution. Devise a warning system to notify those nearby when emergency fuel dumping must occur, including software to include altitude of the dump, prevailing wind directions, projected landfall. Include plans and dates of completion for the control of all evaporative emissions.

1.a. Thank You

6.c. Hazardous Air Pollutant Compliance

6.f. Fuel Dumping

Oak Harbor, WA 98277

Vehicle, aircraft and building pollutants: Quantitatively compare, with and without the Navy's proposed Growler increase, air pollution from all Navy vehicles, aircraft and buildings at the NASW facility. Compare to Whidbey air as if there was no Navy contribution. What are the Navy's commitments to decreasing airborne pollutants?

1.a. Thank You

6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

6.b. National Ambient Air Quality Standards Compliance

Oak Harbor, WA 98277

1.a. Thank You

14.a. Transportation Impacts

14.c. Pedestrians, Bicycles, and Bus Stops

Why doesn't the Navy expedite entry and exit of Island Transit busses to Ault Field, in order to permit scheduling? How would facilitating this public transit decrease traffic and pollution of off-base personnel who could now use public transit. How could the base schedule work shifts to encourage use of public transit? Quantitatively disclose the impact of more Growler aircraft and flights on personnel traffic and pollution on Island County public roads.

1.a. Thank You

12.k. Compensation to Citizens for Private Property

Oak Harbor, WA 98277

Sales taxes: Not being required to pay sales tax for goods and services is part of military personnel compensation, and a benefit for military retirees. But it comes at a cost to the surrounding community. Public transit is but one of many County functions supported by sales taxes. Why doesn't the federal government reimburse the local community for sales taxes not collected by active and retired military? That would fairly spread the cost of our military to the entire Country rather than just on the local community. With the proposed increase in personnel with the proposed increase in Growlers, this imbalance will only get worse. What does the DEIS offer as a solution?

1.a. Thank You  
12.m. Education Impacts

Oak Harbor, WA 98277

School federal impact fees, paid to local schools to compensate for children of military families living in federal housing that do not pay property taxes, have been decreasing in contribution per student in the past several years. And that federal contribution has always been less than the local cost per student. And that Impact Aid has been paid up to 3 years after the student has been taught. With 600 additional students projected along with the additional Growlers proposed, what does the DEIS offer as a solution to this imbalance of funds generated per military family student?

Oak Harbor, WA 98277

The DEIS explains that incident ground level sound is predicted by computer software based upon hypothetical flight patterns. Where is the science proof that this approximation is accurate, compared to real world, on-the-ground sound measurements? I have offered my own Oak Harbor parcel as one location for actual sound level measurements. I never received the courtesy of a reply. Trust but verify. Good advice to boost confidence in the Navy's predicted sound levels. Please offer proof with the EIS that your sound level approximation is accurate.

1.a. Thank You

4.a. General Noise Modeling

4.f. Noise Measurements/Modeling/On-Site Validation



Oak Harbor, WA 98277

There are several federal clean-up pollution sites on the Navy's land. What is the cleanup progress on each? Will additional Growlers add to the problem of pollution and required cleanup? The DEIS did not address disposal of hazardous waste generated by these additional Growlers, nor did the DEIS address ongoing waste site cleanup. Would additional Growler aircraft hinder cleanup, or add to the problem? Ground water pollution by dumped Navy chemicals: What is the extent of the pollution? Have the parcel owners impacted been warned and compensated? What is the migration of these polluted ground waters? The EIS should offer maps, pollution migration predictions generated by a neutral third party.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

12.k. Compensation to Citizens for Private Property

Oak Harbor, WA 98277

1.a. Thank You  
10.j. Plants

I see invasive plants growing unchecked on Navy land, and spreading elsewhere. With the additional Growlers, will there be funding available to eradicate these invasive plants? How do you propose to do so....with chemicals, or by manual removal. How do you plan to dispose of these invasive plants?

Oak Harbor, WA 98277

- 1.a. Thank You
- 2.k. Range of Alternatives

I see unused Navy land in Island County: Crescent Harbor, Polnell Point, parts of Ault Field, Lake Hancock. What does the Navy intend to do with this unused land? The DEIS does not address paying for the additional Growlers and personnel. Selling this unused land, to help pay the increased cost of more Growlers, has not been addressed by the DEIS. It should be included. Selling this unused Navy land would have an environmental impact.

1.a. Thank You

10.a. Biological Resources Study Area

Oak Harbor, WA 98277

I have witnessed Navy aircraft violating clearance distance requirements from bald eagle nests (see USFWS requirements - The Bald and Golden Eagle Act). I have inquired of Navy pilots if they knew clearances and seasons of vulnerable disturbance. These pilots had not been instructed as such. What will the Navy do, with the proposed increase in aircraft and personnel, to insure that wildlife and habitat encumbrance restrictions are known and obeyed by Navy personnel?

Oak Harbor, WA 98277

What is the projected growth of NASW? How many aircraft, flights, personnel do you project in time, that the community and the airfields physical plant can expand too? What is your justification for that carrying capacity of growth in our community? What is the safety impact of projected growth? What is the air pollution impact of projected growth? This should be studied and explained in the final EIS, and time allowed for public comment. Public comments should be disclosed, both in numbers and types of comments.

- 1.a. Thank You
- 1.d. General Project Concerns
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Oak Harbor, WA 98277

1.a. Thank You

2.n. Alternatives Considered But Eliminated

What is the Navy's intent for flight simulators, both in the latest technology, and in construction timing and use? With up to 38 additional Growler aircraft proposed by the DEIS, how could use of these simulators reduce overflights, pollution and improve safety? Convey cost / benefit of advancing flight simulator technology and use as part of the Navy's intent to mitigate the additional noise, pollution and safety concerns with the proposed increase in aircraft.

1.a. Thank You  
12.m. Education Impacts

IN THE MATTER OF:  
The Open House Public Meeting for the Draft Environmental  
Impact Statement (EIS) for EA-18G "Growler" Airfield  
Operations at Naval Air Station (NAS) Whidbey Island Complex

DATE TAKEN: Tuesday, December 6, 2016

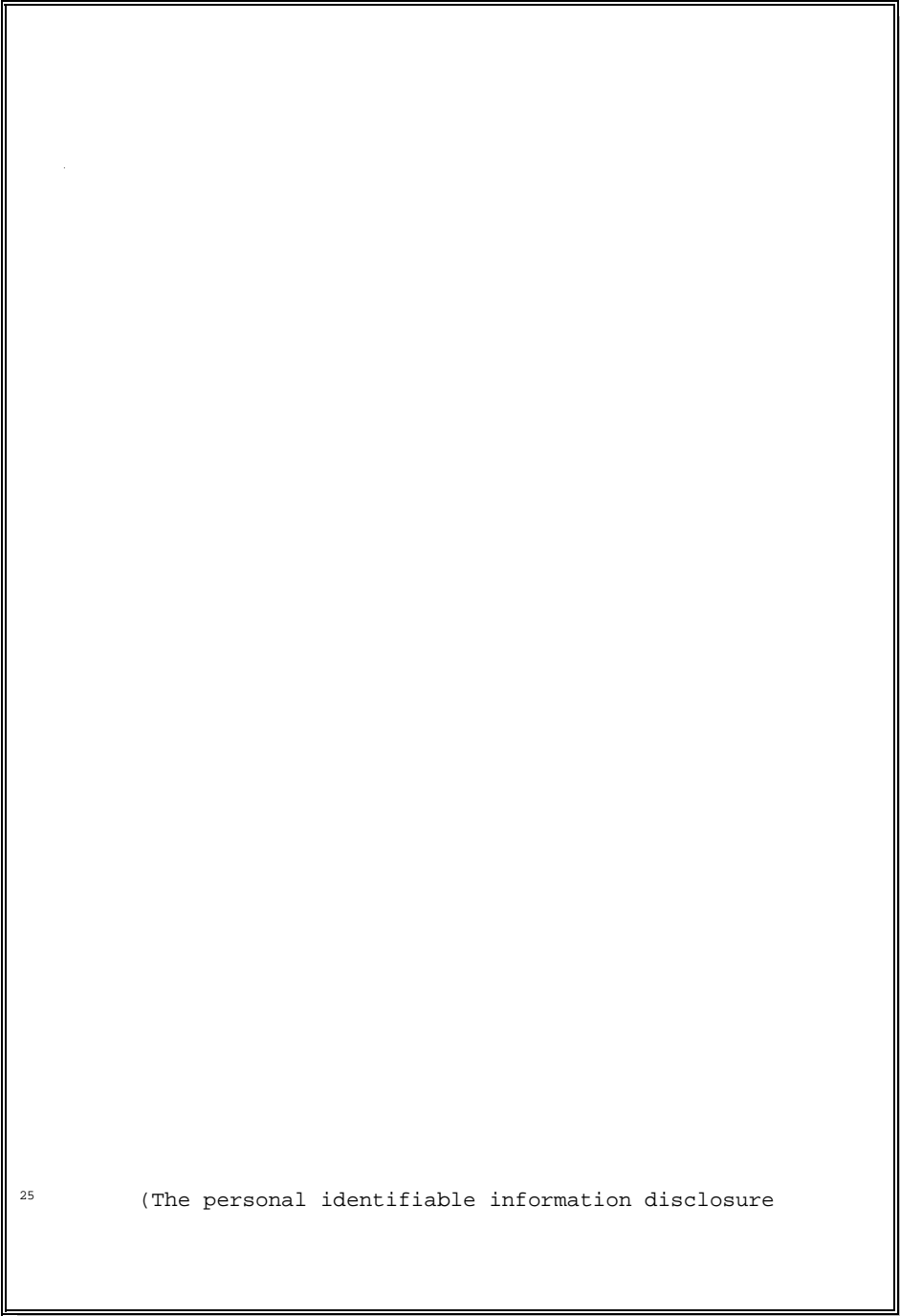
PLACE: Elks Lodge Grand Hall  
155 North Ernst Street  
Oak Harbor, Washington

TIME: 4:00 p.m. to 7:00 p.m.

REPORTED BY: Mary Mejlaender, CCR No. 2056  
Likkell & Associates  
Court Reporters & Legal Video  
2722 Colby Avenue  
Suite 706  
Everett, WA 98201  
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LIKKEL & ASSOCIATES, COURT REPORTERS & LEGAL VIDEO  
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(425) 259-3330



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(The personal identifiable information disclosure



1 statement was read to the following commenter.)

2 MR. [REDACTED]: I can tell you that I don't  
3 care about that. Feel free to tell whoever you want  
4 whatever I say. I'm not ashamed of it. I'm proud.

5 I would like to talk to you about community  
6 spirit. I think that, be it 80/20, 50/50 or 20/80, we are  
7 putting neighbor against neighbor in our communities.  
8 Coupeville residents: Do it all in Ault Field. Ault Field:  
9 Do it all in Coupeville.

10 Retirees, many of them live here. So there is a  
11 real feeling -- I live in Oak Harbor -- of neighbor against  
12 neighbor. And I compare the community spirit to Anacortes,  
13 to Port Townsend, where I believe there's a lot more oneness  
14 in community spirit that's lacking in Oak Harbor, in  
15 northern Whidbey, and I can only attribute that to the Navy.  
16 And so I think that the Navy needs to keep that in mind with  
17 their proposals of percentages of flights where.

18 The Navy does many things with the community, the  
19 parades, flyovers, that are obviously an asset to the  
20 community, but I think that their operations also have the  
21 possibility of having a negative impact on the community.

22 One related thing to that is school kids and how  
23 fast schools must accommodate the big increase in  
24 population. And I believe that's part of the proposal with  
25 37 more Growlers coming to the Naval Air Station Whidbey,

1 that there will be more families, more children impacting  
2 the schools. And it's my understanding that the federal  
3 government offers an impact fee to the school district for  
4 those children whose families live in base housing that does  
5 not have a property tax element to contribute to schools to  
6 make up for that lack of contribution. And I think that  
7 contribution should match the local cost per child, not be  
8 an arbitrary amount. It's my understanding that that impact  
9 fee varies whether you're in one base or the other base, and  
10 I think that it should be determined, like I said, by the  
11 local cost per child.

12 I also think that that impact fee should be paid  
13 to the school as the child is being taught and not up to  
14 three years afterwards. Schools can't borrow money. They  
15 need the -- they need the funds to teach the child when the  
16 child is there. It's my understanding that's not happening.  
17 So that contributes also to this -- the subject of community  
18 spirit. If I'm feeling like I'm paying more than my share  
19 of the burden for military children that are going to school  
20 here because of the impact fee deficiency or lateness, then  
21 that doesn't help my feelings towards the Navy.

22 So I would just like -- it's a very intangible  
23 thing, but I would like for the Navy to consider what they  
24 are doing to this whole feeling of community spirit in our  
25 community.

1 Thank you very much. My name is [REDACTED].

2 (The Public Meeting concluded at 7:00 p.m.)

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Oak Harbor, WA 98277

1.a. Thank You  
4.t. Noise Mitigation

Has the DEIS considered chevrons, or other quieting modifications to Growler aircraft. Please do, along with any other sound decreasing technology and operation possible. Provide comparison data for various sound decreasing and attenuating devices.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Oak Harbor, WA 98277

As an alternative to field carrier landing practice (FCLP) at both Ault Field and Coupeville, has the Navy considered anchoring a decommissioned aircraft carrier in the Salish Sea, perhaps near Smith Island, for use instead. I have not seen this option presented in the DEIS. The carrier deck could be extended 100' to both bow and stern to make it easier and safer for trainees. The deck could be thoroughly illuminated for night landing, and even not lighted later in training. The catch cable could be removed for touch and go training. This proposal would be much safer without all the population at risk around the two Whidbey airfields. This option would be quieter than using Whidbey runways, fir the civilian popilation nearby. The carrier could swing about its anchor with the wind direction. It could be located away from existing shipping lanes. Please consider this option with your EIS.

Oak Harbor, WA 98277

With all electronic aircraft such as the Growlers concentrated in one place on the west coast at NASW, what defense system is in place to stop an ICBM launched from North Korea, perhaps with a nuclear warhead? With up to 38 additional Growlers proposed, this target of NASW to our enemies, becomes even more acute. With the ever-growing population around NASW, defense from any aggressor becomes more and more important. Please explain in detail your existing defense of our community before placing an even greater target on our backs with the proposed increase in Growlers.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

Oak Harbor, WA 98277

With all electronic aircraft such as the Growlers concentrated in one place on the west coast at NASW, what defense system is in place to stop an ICBM launched from North Korea, perhaps with a nuclear warhead? With up to 38 additional Growlers proposed, this target of NASW to our enemies, becomes even more acute. With the ever-growing population around NASW, defense from any aggressor becomes more and more important. Please explain in detail your existing defense of our community before placing an even greater target on our backs with the proposed increase in Growlers.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

Oak Harbor, WA 98277

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative

██████████ Harbor, WA 98277 ██████████ ██████████ 7EA18G Growler  
EIS Project Manager Naval This DEIS proposal offers three concentrations of Growler flights - 80% / 20%, 50% / 50%, and 20% / 80%. I offer two comments for your consideration: 1) As an Oak Harbor resident, and given only these three choices, of course I prefer that 80% of the Field Carrier Landing Practice flights (FCLP) occur at the Coupeville runway. Remember, for each Growler that flies Coupeville, it must take off and land at Ault Field passing over Oak Harbor on route. So, even the 80% Coupeville and 20% Oak Harbor option has a heavy impact upon the overflight noise, pollution and safety of Oak Harbor. And consider too that maintenance noise and pollution, P3 flights and P8A flights, as well as other aircraft, all originate and end at Ault Field creating more noise, pollution and safety concerns above and beyond FCLP flights. The Navy states that Coupeville is the best FCLP airfield for practice. It is also the best to fairly distribute noise and pollution and safety concerns between the two communities of Coupeville and Oak Harbor. Given these three options, I prefer 80% Coupeville and 20% Oak Harbor to serve the Navy with your preference, and to fairly distribute all noise, pollution and safety issues between the two communities. 2) But there is a fourth option that I have not seen offered with the DEIS: Why not? This fourth option would allow P3, P8A, and other air traffic to continue at Ault Field except all EA-18G FCLP flights would occur at some other existing training facility. This other facility would be in an area with lots of government-owned land and few people. Most Growler aircraft would remain at this remote airfield unless returning to Ault Field for maintenance (at a state-of-the-art, sound attenuating maintenance facility). Once a week, Growler trainees would be flown in mass (perhaps in a P8A) to this FCLP remote airfield and returned to Oak Harbor at the end of the week, when FCLP is completed for that group. Navy families could remain housed near Ault Field. The Coupeville airfield could remain Navy-owned for those special occasions when FCLP use there was necessary (like during wartime perhaps). Facilities at this remote FCLP airfield would be minimal. Beside the runway and control tower that already exist, some bachelor housing and a cafeteria would be needed, as well as some briefing and office space. All this is likely already available at the remote base. Certainly this would add some transportation cost to training, but it would improve the noise, pollution and safety impact upon the greater population around Ault Field. Housing many Growler aircraft at a remote airfield would also decrease vulnerability from our enemy for both Ault Field and the remote Growler aircraft. Has the Navy considered this? I have not seen this option, or anything like it. Please do consider this option with your final EIS.



Coupeville, WA 98239

This is What Imperious and Uncaring Looks Like When we moved to central Whidbey Island 20 years ago from Seattle, we were seeking a less crowded, simpler, rural life closer to nature. We were ecstatic to be in the middle of the beautiful Ebey's Landing Historical Reserve, a magical place of living history that preserved a way of life almost the way it had been for 150 years. We were, of course, given noise maps to inform us what we could expect from the Navy OLF. This appeared to be, both on paper and in reality, a reasonable compromise between the public's need for peace and prosperity and the Navy's need for pilot practice and training to keep America safe, to help fulfill their mission to serve and protect. No reasonable person would describe the Navy's current desire to vastly expand their operations here as serve and protect. It is instead the callous lack of caring and harm. Here is what an uncaring Navy abandoning reasonable balance looks like: 1. Increasing the number of low-flying jet flights six-fold. 2. Using significantly noisier jets. 3. Expanding the flight zone and noise map, including more populated areas and a national park! 4. Expanding the hours of operation. This will make living here seem like being in the middle of an airport, not bordering an airport, and with much louder planes. No one in their right mind would believe the effect will be anything other than extremely harmful to quality of life, property values, tourist business profitability, education, and likely (though hard to prove) public health. It will also put public safety at increased risk. Our political representatives, cowed by the Navy, seem impotent in the face of it. In the 20 years we have lived here the population of Island County has increased by almost 20% from roughly 69,000 to 82,600. How densely populated does it have to get before the idea of such a dramatic expansion becomes obviously ridiculous? Do the pilots need to practice to remain sharp, safe, and effective? Of course they do, but their practice location needs to be diversified. If the northern part of Whidbey is so supportive of this monster expansion, then they need to share in the consequences. There needs to be another practice field up north so that they are not deprived of hearing the Sound of Freedom as much as central Whidbey does. Or, since Whidbey jets sometimes fly over the wilderness passes through the Cascade Mountains to practice, perhaps there should be another practice nexus east of the mountains in the empty scablands. Instead of being a compatible good neighbor, the Navy has broken the longstanding, unwritten gentlemen's agreement to reasonably share the island, upped the ante, pulled a bait-and switch, and now appears perfectly willing to ruin our way of life and the value of our financial investments. With the Navy caring so little for our welfare and pressing ahead to get what they want because they can, and if they imperiously refuse to diversify their practice locations in order to avoid doing us harm, then they have forgotten their mission, ceased to be our protector, and have become our enemy.

- 1.a. Thank You
- 1.d. General Project Concerns
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.n. Alternatives Considered But Eliminated
- 5.a. Accident Potential Zones

Langley, WA 98260

First, I want to thank our Navy for extending the public comment period for 30 days and for their service to our communities and country. I also request a 60-day comment period after the EIS is published. After careful review of the proposed DEIS for NAS Whidbey Island, as a citizen, resident and taxpayer in Island County, I have serious concerns for our residents, local business interests and tourism regarding the impact of such implementation as follows: 1. Increasing Field Carrier Landing Practice (FCLP) at OLF will degrade the visitor experience at Ebey's Landing National Historical Reserve, resulting in economic losses to Island County. This would negatively affect county supported infrastructure, education and social services island-wide. 2. The DEIS improperly omits Coupeville Middle/High School as a "Point of Interest." 3. Discussions of groundwater in the DEIS are inaccurate and out of date. 4. The assessment of earthquake risk in the DEIS is incorrect and not based on best available science. 5. The DEIS relies on noise models that are outdated and inaccurate. Increased use of OLF will create unacceptable noise impacts on residential and public areas. The DEIS does not give proper consideration to real, on-site noise measurements. Beyond "nuisance" factor, increased and sustained high-decibel levels pose serious health impacts to people and animals. Navy Growlers may well be heard beyond central island and extend to more populous areas of South Whidbey and beyond to the peninsula and Port Townsend. 6. The proposed scenarios would create greater economic hardship for property owners than described re: negatively affecting property values and ability to sell; no mitigation measures are described in the DEIS. 7. The runway at OLF Coupeville is too short for the proposed actions. The OLF runway is the Navy's shortest FCLP runway and does not meet the Navy's own standards for FCLP use. 8. The DEIS does not suggest an Alternative OLF location that would lessen environmental impacts to the community. Recommendation: The Navy should consider NWSTF Boardman as an alternative OLF site to accommodate the increased FCLPs expected as the number of EA-18G Growler aircraft planned for NAS Whidbey is increased. This alternative would minimize new environmental impacts for Ebey's Landing Historic Reserve and the Central Whidbey Island community. It could also decrease FCLPs at Ault Field while retaining the economic benefits of the Growler community in Oak Harbor. Respectfully submitted, ■■■■■

■■■■■ Langley, WA

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.l. Community Service Impacts
- 16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.l. Points of Interest

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA  
 23508, Attn: Code EV21/SS

1. Name [REDACTED]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 Citizen
3. Address [REDACTED] Clinton, VA 98236
4. Email [REDACTED]

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

### Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

As a resident of Whidbey Island, I am very concerned about -

- Water Contamination to our sole source aquifer
- Actual noise measurements were not made!
- Alternatives to using the OLF were not adequately assessed
- Impact on children - not adequately addressed
- Economic impact on tourism, property values, loss of businesses not addressed adequately
- Impact to natural resources, wildlife, impact on Ebey's Landing Reserve not adequately addressed
- Frequency + impact of fuel dumping on homes + farms not addressed

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

Clinton, WA 98236

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP)

Clinton, WA 98236

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP)



Clinton, WA 98236

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Clinton, WA 98236

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.



Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Clinton, WA 98236

1.a. Thank You  
4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month")

Clinton, WA 98236

1.a. Thank You  
7.c. Noise Disclosure

Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Clinton, WA 98236

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Clinton, WA 98236

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Clinton, WA 98236

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Clinton, WA 98236

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

Clinton, WA 98236

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.



Clinton, WA 98236

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

1.a. Thank You

4.q. Potential Hearing Loss

Clinton, WA 98236

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.



# Public Meeting Comment Form

Thank you for attending the public meeting on the Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) Provide written comments at today's public meeting; (2) Speak with the stenographer, who will record your comments; (3) Submit your comments on the project website at www.whidbeyeis.com; or (4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

- 1. Name [REDACTED]
- 2. Organization/Affiliation RETIRED
- 3. Address [REDACTED], COUPEVILLE 98239
- 4. E-mail [REDACTED]
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

MY BIGGEST CONCERN IN READING THE CURRENT E.I.S. DRAFT IS THAT IT DOES NOT SERIOUSLY ADDRESS THE HARMFUL AFFECTS OF THE GROWLER'S NOISE AT THE PLANE'S HIGHER LEVELS (DB'S) 110. THIS IS A GENUINE PROBLEM IN TAKEOFF/LANDINGS AT THE OLF. THIS AREA HAS A LARGE NUMBER OF RETIRED PEOPLE WHO ARE FAR MORE TO ADVERSE HEALTH CONDITIONS FROM EXPOSURES IN NOISE. I HIGHLY ENCOURAGE NAS WHIDBEY TO OBTAIN AT LEAST A SQUADRON'S COMPLIMENT OF THE NYLON EXHAUST Baffles WHICH CAN ROTATED SQUADRON-

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

OFFER →

**YOUR INPUT MATTERS**

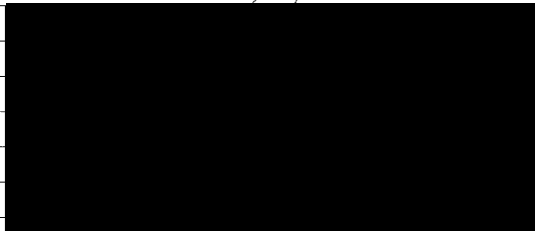
TD - SQUADRON WHEN YOU GO PRACTICES ARE CONDUCTED.

- 1.a. Thank You
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.t. Noise Mitigation

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These would go a long way toward  
improving community relations while  
retaining sufficient operational conditions  
characteristic of touch & go practice runs.

Thank you



For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

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6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1.a. Thank You

Oak harbor , WA 98277

The navy was here flying long before 99% of these folks lived here, they moved here knowing jets fly and practice operations... they have no right to bitch, whine or complain about the noise. . . Leave if you can't tolerate the freedom....

1.a. Thank You

Anacortes, WA 98221

EA-18G Growler training is vital to our nation's defense. NAS Whidbey, OLF Coupeville, and the PNW Range provide critical training resources with minimal environmental impact.

Sequim, WA 98382

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

I live in the community that is affected by the noise pollution from the Growler Jets, and I hike in the forests that are targeted for the electronic warfare apparatus. Your request for comments comes during the busy holidays when many of us are traveling. We urgently need a 45-day extension to study your impact statement. [REDACTED]



Sequim, WA 98382

Boise State University ecologist, Jesse Barber, has been studying the effect of noise on birds who are acoustically specialized like the saw-whet owl. In the experiment, they found that each time they increased sound by a decibel, the owls' hunting success declined by 8 % until at 60 decibels, the owls failed to capture any prey at all. Another scientist, Clinton Francis, from the California Polytechnic State University has concluded that, "We're now seeing that noise may actually pose a big threat to biodiversity." The plan to conduct an experiment with such high levels of noise in such a rich and sensitive eco-system when there is an alternative location seems unnecessary and ill-advised.

1.a. Thank You  
10.c. Wildlife Sensory Disturbance and Habituation  
2.k. Range of Alternatives

COMMENTS on the  
Draft Environmental Impact Statement for EA-18G Growler Airfield Operations at Naval Air  
Station Whidbey Island Complex

To:  
Attn: Code EV21/SS  
Naval Facilities Engineering Command Atlanta  
6506 Hampton Blvd.  
Norfolk, VA 23508

From:  
[REDACTED]  
No organization  
[REDACTED], Port Townsend, Wash. 98368  
[REDACTED]

I would like to receive a CD of the Final EIS when available.

Comments:

1. Why is there not a valid no-action alternative? Not having one is contrary to NEPA. The one shown at the open house was just a continuation of your baseline activity.
2. Why is there no "Preferred Alternative"? This also is contrary to NEPA. This action precludes the public from acting on your preferred alternative. There must be a comment period after the Navy decides on a preferred alternative.
3. Why was funding committed prior to when the NEPA process was begun? This is contrary to NEPA. Orders for additional Growlers have been placed and the jets are being manufactured. NEPA prohibits commitment of funds for a project until after the public process is completed.
4. The EIS indicates the Growler flights will increase by 47%, and that the Navy may change land use designations in surrounding residential and farming areas to a category of "incompatible", meaning incompatible with activity near a naval base. How can this be done without, at least, consultation with local jurisdictions? Consultation has not been done. And, this action is a "taking" of land if only an easement. There is no mention of compensation to owners. Land use laws prohibit actions of this type without compensation. How will the Navy compensate property owners for the land or for an easement? This question should not be pushed off to another US agency or to Congress. And, it should be dealt with prior to the final EIS.
5. The noise generated by the Growlers is extremely strong. This is the major issue with the Growlers. People and animals and sea life, particularly children and older citizens are strongly impacted. Some of these impacts may be permanent, particularly for cumulative impacts. Cumulative impacts are not mentioned in the EIS. How can this be?? For sea life, orcas, they

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

use sound to navigate and to socialize. What damage are the Growlers doing to humans, animals and sea life? This must be studied prior to a final EIS.

There is research that is ongoing regarding how to reduce the noise made by Growlers. This research needs to be completed prior to the final EIS.

Quilcene area measured 80 to 85 dB when Growlers fly over. The Navy has used noise data which is not defensible. The EIS only evaluated (modeled) the noise around the naval air base at Whidbey Island. The modeling used data comparing raw noise data measured 12 years ago with real microphones but in a quiet and a flat land location. (New data/software is available but was not used). The report says the noise measurements made in the old program may not be “legally defensible” for current and future projections. Why was it used when new software is available? In the EIS all data was combined in the modeling process and then one number was used. This is not, in any way, reality. The Growlers will be practicing over the OLD field, will be flying over the Olympic Peninsula, will be over flat land and mountains, and over land and water. Please explain how one number can be used to fit all these conditions. And, John Mosher, the head of the NEPA, confirmed to one participant that the measurements for modeling were made using a jet engine sitting on a platform, with no aircraft and no afterburner. This can in no way mirror what is actually going on in the field. I request the Navy redo the EIS and take actual noise measurements of Growlers with afterburners in various places—mountains, flat land, water, land next to water (to get reflections). This would give more realistic data. Why was this not done for the original EIS.

6. As a final comment, why was Canada excluded from the comment process? Victoria and Vancouver will be heavily impacted by the Growlers as will the North Olympic Peninsula. Their comments should at least be given a hearing at a public meeting before the final EIS.

Thank you for the opportunity to comment. And, please rely to comments.

██████████

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Coupeville, WA 98239

I am very much against the increase in Growler flights at OLF Whidbey Island. The flights have proven to be dangerous in terms of hearing issues, potential crashes not to mention the loss of tourism. What is the Navy going to compensate me for the loss in my property value?

- 1.a. Thank You
- 12.h. Tourism
- 12.k. Compensation to Citizens for Private Property
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones

greater Langley, WA 98260

I retired to Whidbey Island 13 years ago and chose a home site in a peaceful treed area near the Saratoga Passage shore just 3 miles outside of Langley. All was fine until the Navy upgraded to the new Growler planes for their training at the OLF. Not only can I hear them when in my yard but above the TV in the den with the windows closed. The noise level at my home is not disrupting despite my disappointing loss of the woodland tranquility. I also serve on a number of boards and committees that meet in venues from Coupeville up to Deception Pass State Park. In the days of the Prowlers, when they would fly near our various conference rooms, we would roll our eyes and talk louder. Now it is a matter of all talking stops, you must cup your hands over your ears to mitigate the horrific roar of these new, much louder Growler planes. My heart goes out to people who, like I made certain assessments and decisions as to where to live and felt they could cope with the Prowler noise. I can tell you that people can become accustomed to living in apartments next the the L in Chicago but life has surely become a living hell for those living in close proximity to they fields. The whole of Whidbey Island, citizens, livestock, and innocent wildlife would appreciate any efforts that can be made to reduce the noise of these aircraft or find an alternative, less populated site that they can fly to for the touch-and-go. It is also infathomable that approvals would be given to conducting of sound blasting exercises in the pristine wilderness of the Olympic Peninsula. I am extremely disappointed.

- 1.a. Thank You
- 19.d. Electronic Warfare
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.k. Comparison of the Prowler to the Growler
- 4.n. Speech Interference (Indoor and Outdoor)
- 7.f. Impacts to Wilderness Areas

Coupeville, WA 98239

The USN has caused a 'chemical plume' that extends from the Navy base southward into the city of Oak Harbor. AND more chemicals associated with THEIR JETS has contaminated fresh water south of Oak Harbor...in Coupeville where the OLF happens to be. Hey...we need our fresh water free of chemical, cancer-causing contamination. So...no more disrespecting our citizens or our environment.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

6.b. National Ambient Air Quality Standards Compliance

6.c. Hazardous Air Pollutant Compliance

Coupeville, WA 98239

1.a. Thank You  
12.n. Quality of Life  
4.o. Classroom Learning Interference

As a 35 year resident of Coupeville, I have noted many close friends leaving our area due to the extremely loud NAS Whidbey jet Noise. And now, the even louder Growler jets. But when people decide to move, they find their homes not saleable. NOBODY wants to live under the ever louder jets. Our schools must pause for several minutes at a time up to 5 TIMES AN HOUR! And we are being asked to host even MORE jets in the very near future. My friends, neighbors and my family all say "ENOUGH!" ENOUGH! [REDACTED]



Coupeville, WA 98239

As a longtime resident and practicing MD Here in Coupeville, I have seen first hand the significant negative impact of USN Growler noise on ALL our citizens, young and elderly. More jets stationed here will create a huge increase in the stress level inflicted upon all our citizens. AND the USN has spoiled much of our sole-source freash water aquifer with their careless use of fire retardents. It is a matter of public record. PLEASE rethink the dramatic increase in the number of Growler jets to be stationed here. As a longtime physician and former Isl. Co. [REDACTED], those jets are.... CONTRAINDICATED! [REDACTED]  
MD

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
2.k. Range of Alternatives  
4.r. Nonauditory Health Effects






# Public Meeting Comment Form

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To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

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- 1. Name 
- 2. Organization/Affiliation *ret. Physician*
- 3. Address  *St., Coopersville MO*
- 4. E-mail 
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

*Due to this being the very busy holiday season, I request an extension of the time you would submit information on the topic*  
*Thank*



Please print • Additional room is provided on back

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Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Coupeville, WA 98239

The USN has contaminated our sole-source aquifer delivering precious fresh water to Islanders, increased noise...and the threat of same...has driven homeowners away, the Impact Statement never took into account the effect on our children, outdoor activities, our tourism economy which is huge. The stress caused by these very loud jets, in my view, causes significant psychological and cardiovascular damage to our fellow citizens in the HIGH NOISE ZONES. NOT a good idea by our USN and DOD. I wish to protect the citizens of our precious Island. This will not work here!

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
12.h. Tourism  
4.r. Nonauditory Health Effects

## 1.a. Thank You

Anacortes, WA 98221

I lived under the flight past in/around Oak Harbor, depending on which house at the time, for 30+ years, plus 7 years on Camano Island directly across Saratoga Passage on Camano Island even with the OLF. Now I live in Anacortes, and sometimes, the Growlers fly overhead here, if they're on that particular flight path for the day. Yes, the noise is a nuisance, but it has never been so constant that it has been a hazard to my health or hearing. I've always believed that training our flight crews outweigh any inconvenience their noise could possibly make to me. Most of these complainers are fairly new residents, who should have asked more questions when they knew a naval air station was nearby. I have no sympathy for them and believe their complaints hazardous and perhaps even treasonous to our national defense. I totally support NAS Whidbey Island and the Growler community.

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
Resident
3. Address [REDACTED] CU 98239
4. Email [REDACTED]

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

### Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

Childhood learning is a serious concern. I have 3 grandchildren who attend school in Coupeville. The EIS needs to address the High School & Middle school both in the impact area. Actual noise measurements should be taken at all 3 schools - in conditions of ① windows closed ② windows open & ③ outside.

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For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



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 23508, Attn: Code EV21/SS

1. Name [REDACTED]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 903 Resident
3. Address [REDACTED] CV 98239
4. Email [REDACTED]

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(over)

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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I am a homeowner in the Town of Coupeville with a young family. I am concerned about the property values declining with increased Growler flights. They are hard to ignore - I fear prospective buyers will go elsewhere and my home will lose value.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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Scio, OR 97374

Dear Sir/Madam The Olympic Peninsula is a unique environment and with its habitat comes birds, sea life and other wildlife that would suffer greatly from the noise and other emissions of jets. Many of us enjoy the Peninsula as we travel to the surrounding islands. Furthermore, it seems that the lives of Native Americans have not been considered in the Growler Airfield proposal. I urge you to scrap the project in recognition of the huge number of negative impacts it will have. Please. Sincerely, [REDACTED]

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 9.a. Consideration of Tribes

Sequim, WA 98382

First I want to thank you for extending the comment period regarding the impact of the Growlers. I currently live on the Olympic Peninsula but prior to this I resided in Anacortes, where I lived under a flight path. I'm quite distressed in hearing that the Navy wants to increase the number of Growlers and extend their operations. I'm especially concerned because of the Olympic National Park and the effect this decision will have on the people who live near the park, the visitors and the wildlife. The national park system was created to protect and preserve significant areas and a great deal of time, energy and effort was put into creating and maintaining both Ebey's Reserve and the Olympic National Park. Since I have lived first hand with the jet noise and I know that it is disruptive and terrifying. I feel that the mission of the national parks should not allow this type of disturbance within or near park boundaries. The Navy has shown the effect that the trianing operations will have on areas adjacent to the runway but failed to do proper due diligence on the greater region, including the San Juan Islands and the Olympic Peninsula. The possible side effects of increasing the programs include noise, pollution from emissions, electromagnetic radiation, and crashes. There also are monetary considerations as most people who live on the San Juans or the Peninsula don't have homes that are properly insulated against such loud noises and would need to pay for the materials and insulation. These areas also will not benefit financially from the base operations expanding as they live too far from naval station. In fact, many could be hurt from decreases in tourism, which I understand has already happened on Whidbey in Coupeville and at Deception Pass. This could deal a severe financial blow, especially near the national park. I also understand that the Electronic Warfare Range will be conducted near the Reservations on the Peninsula. This is land that has been the home of Native Americans long before the European settlers came and it is the duty of the federal government to honor and preserve it. I also have great concerns about the effects of the noise on so many people in the population. I understand that the Navy averages the noise, combining both noisy times and quiet times, thus giving a false reading. I'm concerned how this will affect Navy personnel and nonmilitary workers at the base, children, elderly people, sick people and people who work outside. All of these could end up with hearing loss or worse. I know that hearing loss is one of the most common disabilities of veterans and I hope that you will safeguard the health of the Navy personnel and their families and not subject them to harmful decibels. I also know that there was a \$34 million settlement over jet noise in Virginia that could end up being duplicated here. Wouldn't be better to prevent such a thing from happening in the first place by going back and doing a risk assessment that takes into account the all factors, including pollution, property damage, cultural and heritage damage, wildlife and natural environment damage as well as health risks. Again, thank you for this opportunity to express my concerns. I hope that you will be able to consider some alternatives to the proposed plan that will take into account the health and safety of all living things in the region. Regards, [REDACTED] Sequim, Washington 98382

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 12.h. Tourism
- 12.k. Compensation to Citizens for Private Property
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.i. Proposed Action
- 4.d. Day-Night Average Sound Level Metric
- 4.q. Potential Hearing Loss
- 7.d. Recreation and Wilderness Analysis and Study Area
- 9.a. Consideration of Tribes

**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Resident*

3. Address \_\_\_\_\_ *CU 98239*

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

I have 3 children ages 2-7. Their bedtime is 8-8:30 pm. They don't take naps - so it is important that they get a full nights sleep. When the Growlers are flying they cannot sleep. If they start after they fall asleep it wakes them up & they are unable to go back to sleep very disruptive to our family, & to their well being.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Resident*

3. Address [REDACTED] *CW 98239*

4. Email [REDACTED]

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(over)

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- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

As a resident before and after introduction of the Growlers - I can say that the Prowlers were acceptable - & the Growlers are significantly louder & more oppressive. The measurements in the EIS are clearly too low based on my experience. I am requesting actual noise measurements be made for the EIS.

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1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_ *Resident* \_\_\_\_\_

3. Address \_\_\_\_\_ *CU 98239* \_\_\_\_\_

4. Email \_\_\_\_\_

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- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

The EIS is incomplete & inaccurate on many points. OLF does not meet minimum (no crash risks) requirements. To comply will cause a huge impact on County resources, residents & business. There are many alternative sites that would be more suitable as they are built new.

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# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]
2. Organization/Affiliation homeowner / US citizen
3. Address [REDACTED] CV 98239
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

I have been a homeowner in CV (town) since 2000. In 2006 I moved to Ledgewood Beach. I was aware of Navy operations & was able to live with the level of noise in both locations. When the new Growlers arrived I immediately felt my quality of life diminish - to an astonishing degree. What had been a nuisance became an invasion.  
① Noise. The house vibrates & I must go inside & close doors & windows to have a phone conversation. Local noise ordinances provide quiet after 10 PM.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.u. Local Noise Ordinances
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 7.i. Deception Pass State Park and Other State Parks

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The flights go on until past midnight. I can't go to sleep I experience anxiety & fear. -It is as if I have an invading force taking away my peace & serenity. I have called 911 to complain late at night only to learn the Navy does not have to comply with civil laws. The Navy has the right to follow their own code - under the pretense of national security. Flying in an environmentally sensitive, tourist dependent location is not essential. Training should be done elsewhere!!!!

My children attend school in CV and the noise (and) will impact their learning year after year. I recently took relatives to Deception Pass - they were dismayed by the level of noise created by the jets flying over the park. When they describe the night their point is always shared.

② Pollution & environmental degradation.

Fuel emissions are a byproduct of aviation. Every reserve has pristine farmland. Admirably Inlet has the freshest water in the area. Having the level of proposed air traffic will degrade our environment. This doesn't even address the damage APEXHD done to our town water.

③ Safety

I live in fear of an accident for myself, my neighbors & my family. The population density prohibits any guarantee of safety. This risk is NOT necessary. These operations should be held at Moses Lake or other similar areas away from this area.

The deception regarding the impact of noise (decible levels) on hearing issues indicates to me that the

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Please print

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6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

YOUR INPUT MATTERS

GROWERS NO!!!  
GO AWAY!

1002860.0041.10

1/23/16



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

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1. Name [REDACTED]
2. Organization/Affiliation NA
3. Address [REDACTED] Langley 98260
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

The Navy is operating an impossibly small footprint for what are LARGE operations - touch and go training of the Growlers. Only 700 acres around a World War II vintage <sup>5200 ft</sup> runway (Navy reqs ask for 8000ft + 30000 acres). The current 6000+ operations being built to 6-fold challenges this footprint, which includes residences in crash zones at each end of the runways, a town just a mile from runway end, numerous complaining residents @ under the flight path, school children, elderly etc. ~~at~~ etc. The roar

Please print • Additional room is provided on back  
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 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 5.a. Accident Potential Zones

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of objection is rising, causing more headaches for schedulers and for public relations. This will only increase, as will the very real probability of a crash into homes — crashes happen throughout the armed forces. When a crash happens the disturbed residents will have little patience with this giant operation crammed into their midst and will push hard for an O&E-exit — a "take your operations to a reasonable footprint in the desert where they belong!" will be the refrain. Why not start this move now as it will take time to enact. Now is the time, not after an inevitable disaster!

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

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6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Langley, WA (Whidbey Island) 98260

*Date: February 18, 2017*

*To: EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS*

### **Navy Accident-Risk Assessment: Missing-in-Action from the DEIS**

#### **Introduction:**

*(Further explication and expansion of ideas in this introduction are found in pages 3ff following it.)*

From the DEIS, page 4-261: "... While it is generally difficult to project future safety/mishap rates for any aircraft, the Growler has a well-documented and established safety record as a reliable aircraft."

This quote is the extent of effort expended on an accident risk analysis in the DEIS! Yet a thorough risk analysis (despite being "*difficult to project*") must accompany every credible EIS. An EIS must include treating a "maximum foreseeable" (different from worst-case) accident, its probability of happening, its potential adverse consequences and its means and costs of remediation. The magnitude of a risk must be calculated from its probability and its consequences; comparisons of risks for each alternative proposed should be done and this must be included in the final EIS.

Stating "*reliable aircraft*" and "*well-documented safety record*" in the DEIS in no way acknowledges or documents the very real potential for a catastrophic flight incident at OLF. The DEIS writers somehow found it convenient to withhold important statistics (like the 22 crashes since 2000 of the EA-18G and its closely related F/A-18 E,F aircraft) from the DEIS. It also omitted several aggravating factors at OLF that are conducive to catastrophic accidents, capable of endangering the populace, the environment, local properties and indeed, the airmen themselves. The EIS accident risk analysis for all four action alternatives must include obvious risk factors. Some of these are facility shortcomings, unique Whidbey atmospheric challenges, scheduling compromises, contributors to pilot error like night flying, and the very significant and pernicious Growler technical problem, the hypoxia conundrum (on steady rise in the last eleven years) that continues to dog the Growler, its flyers and its engineers.

Furthermore an EIS must include with its accident probabilities the potential harms and disruptions resulting from accidents of various levels of complexity and intensity. Since risk is defined as level of consequences multiplied by probability of occurrence, the more flight operations projected the more probability of crashes and the more risk. Omitting a risk analysis falsely engenders a tone of unrealistic optimism beyond all reasonable credibility. This DEIS puts forth options to multiply flight operations sixfold (amplifying the probability of crashes *at least* sixfold) yet it robotically and blithely pronounces the same "no significant impact" mantra it intoned for the far lesser operation hours. Mathematical reality: dramatically amplifying flight operations will severely escalate the probability of a significant, deadly, destructive "impact."

This response will consider in detail the following EIS-omitted factors that are amplifiers of, and results of, accident risk. (See further detail below for each of the bulleted items):

#### **Compromises on facilities:**

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.a. Socioeconomic Study Area
- 12.d. Population Impacts
- 2.n. Alternatives Considered But Eliminated
- 3.c. Military Training Routes
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

- A runway 25% shorter than Navy-required Growler runway-length.
- 1/40 or 2.3% of regular Navy-required open acreage for flights surrounding the runway
- Residences, a bus fuel-depot, businesses, county facilities, a highway and a city are under runway approach paths and many are within what should be uninhabited accident-risk zones just beyond runway ends.

***Atmospheric conditions:***

- Frequent wind shifts, creating dangerous tail-winds for allowed FCLPs. (Tailwinds are to be avoided for carrier landings.) Some civilian spectators have witnessed FCLPs with tailwinds exceeding strict tailwind-speed (5 mph) regulations.
- Amplified risks from Whidbey's extensive bird life potentially interfering with low level flight ops over water and near forest and hedge areas.
- Frequent fog, rain events, and wind shifts that could force "edgy" "flight on" calls for desperately needed, time-sensitive training flight allocations. This is occasioned by the crowded calendar forced by a 6-fold amplification of flight-op numbers. (Projections in the DEIS would require half the days of the year—183 days—for required flights.) [Calculation below: [1]] This means decreasing the safety envelope around ever-shifting Whidbey atmospheric conditions to the bare minimum to fit flights into a demanding schedule—made demanding because of highly-crowded scheduling and numerous weather-challenged days, especially in late fall to late spring days, and by constant time-pressure from the carrier staff that require training just before Growler carrier deployment.
- A vast "density altitude" difference between OLF (d.a. 337) and typical dry Middle East sortie locations (Persian Gulf d.a. 2182). While not endangering pilots in OLF training, it endangers them in a war theater: it increases their risk of hitting a Persian Gulf carrier deck too hard or not soon enough by misjudging the lift of air th. is vastly different from that in their OLF training.

***Pilots and planes – circumstances contributing to risk:***

- Night flights with tired pilots (tiredness welcomed for realistic practice).
- The troubling rise in the number of breathing and pressurization problems in FA-18G and its close relatives the FA-18E/F; the pilots rate the Growler's tendency toward hypoxia their most pressing problem.
- Pilots are trainees learning new, dangerous maneuvers, automatically increasing accident risk above routine flights done by seasoned pilots.
- The Growlers are part of a family of similar planes that have a significant accident rate (despite the "well-documented and established safety record" stated in the DEIS). This rate becomes part of the accident probability for OLF.

***Effects of catastrophic accidents on the Whidbey Island Community***

- An EIS must state the risk of accidents AND their secondary consequences. Dispersal into the water table of the fire-fighting Type B foam with health-endangering, banned, toxic ingredients is one of these. Training and accidents have already injected PFOS chemicals these into the Whidbey water table, rendering some vital citizen wells unusable, and endangering the Coupeville water supply (toxins present but barely below a dangerous level). These banned toxins are still being stored for emergency use on Whidbey; increased flight ops will amplify risk of their usage and thus endanger the water table that is directly under the OLF.
- Because FCLP practice is taking place in a crowded occupied area, results of a crash are multifold amplified beyond those of a crash in an open desert area. Economic, health and infrastructure damage becomes a major part of the risk equation: consequences times probability = risk, meaning that even risk probabilities that might be tolerated in an uninhabited desert setting become intolerable within a civilian-populated setting.

**Conclusions and Implications of all the risky conditions at the OLF:** the Navy, while still showing considerable insensitivity to citizen complaints, finds itself adjusting flights, limiting schedules, and receiving constant noise complaints, all because it is training on a small footprint passed down through

decades of use whose surroundings have expanded into a very populated region. The metaphor is that it is a huge, noisy, toxic, dangerous foot trying to fit into a small shoe—a foot that is about to grow six times larger, making the headaches of scheduling, logistics, administration and angry public interface six times (or more) larger as well. Over all this activity (and the Navy administration's head) looms the perpetual “sword of Damocles”: a catastrophic deadly accident waiting to happen that could, besides creating civilian deaths, damage buildings, the environment and tourism, meanwhile shattering the public's diminishing patience and faith vis a vis the local “sound of freedom.” That one predictable crash would precipitate intense resistance toward allowing any more operations at OLF, and indeed perhaps at Ault Field (whose noisy and pollutive operations are challenging for Oak Harbor residents). At the least this would create intense pressure for a hasty transfer of FCLPs to another safer location.

To summarize the argument: the elevated risk is not just to citizens and their property, not just to airmen, but to the Navy's whole Whidbey carrier training operation as well. The large accident risk, caused by the perilous, inappropriately cramped operation of training flights at OLF that are planned to be several times expanded, threatens the island *and* the Navy with the prospect of a sudden catastrophic event that enrages the public and forces the Navy to rapidly find an alternate practice location.

Up to now, the Navy has not had the will to thoroughly vet several feasible off-Whidbey training areas for stationing all additional Growler training or perhaps *all* of the controversial, noisy Growler training. (Significantly, some alternate areas have already been used for overflow FCLPs during a 13-month moratorium in 2014, for FCLP scheduling that goes beyond the 6100 flight operations currently allowed, and for training during late 2016 and early 2017 while the OLF is occupied by drilling/testing equipment investigating the toxic pollution spreading from its earlier activities to civilian wells.)

With a realistic assessment of substantial crash risk placed into the EIS it would follow that the time is right now to scope and begin a transition of anticipated increased Growler training to an off-island facility. (More pressure to do this is results from the Electronic Warfare function of the Growlers as a unique military function and such uniary placement of a vital functgion is considered to be dangerous (even foolish) militarily. Single siting of any military function is a violation of the Technical Joint Cross Service Group (TJCSG) guidelines. TJCSG was formed in the wake of the Base Realignment and Closure Act of 1990 (BRAC) to make recommendations to optimize defense structure for cost and strategy. One of the TJCSG's two guiding principles was “*Maintain competition of ideas by retaining at least two geographically separated sites, each of which would have similar combination of technologies and functions. This will also provide continuity of operations in the event of unexpected disruption.*”

So besides lowering an escalating probability of a crash in a populated area and honoring the TJCSG diversification of location guidelines, it would relieve intensifying community pushback as well as build faith in the Navy as a “good neighbor.” Ultimately *all* FCLPs could and should be moved from OLF to all but eliminate the serious accident risk from the Coupeville area AND the oppressive noise from the long-suffering Coupeville, Port Townsend, and San Juan Islands area. It would be a win-win for Navy strategy needs, improved Whidbey public relations, reduced catastrophic risk for residents (and airmen), and vastly simplified planning and administration of the estimated 183 days (half year) of needed flight times for the 35-36 Growler option. The far more predictable atmospheric conditions as well as less complex, negative social, political and infrastructure conditions, would easily offset the additional fuel costs and runway facility construction often cited as a seemingly impossible barrier to training elsewhere. And a bonus: density altitude ratings far more akin to those flown in typical battle zones, adding more safety in carrier landings due to better flight simulations.

## II. Further information and discussion of all the accident-risk factors outlined above:

- The World War II OLF runway is 5,200 feet long; regulations from which it has been exempted (by a permanent waiver issued by the Navy!) require that it be ideally 7000 feet, and this additional length is especially a good margin for trainees. Now most WWII runways were deactivated years

ago, so the antiquated runway depth is thinner than regulation, and thinner than that needed by the heavier Growler, courting the possibility that a mishap could crack or pothole it under a rolling plane. A six-times-intensified use, each FCLP subtly flexing it, will amplify risk from this aging structure. (Especially more dangerous for this use in that rough landings are to be expected for FCLP trainees.) The “make-do” nature of the facility has not gone unnoticed by the Navy. In 1987, a Navy planning document (Navy document 101) reviewed and reported the status of the OLFC for future use. It cites the depth of the concrete and below-standard length of the OLF landing strip as insufficient for new jets and increased use. (Cracking/collapse of a spot during a landing could catch a wheel, or disorient the plane, collapse landing gear, etc., resulting in a crash or dangerous re-direction toward structures or the highway.) Yes, there is a highway (with average 9000 vehicles a day) just a few seconds ahead of the fighter's carrier-landing spot. The nearby highway danger is further amplified by the fact that often crowds of parked cars and gawkers accumulate to watch the FCLPs and these people could be struck directly or indirectly during an FCLP failure. There are also amplified driver-risks in that takeoffs, landings and orienting are just small height above the drivers causing distraction and startling.

- During a concerted attempt in 2010 to set up an outlying practice field in eastern North Carolina, the Navy specified for the group of candidate locations that about 30,000 acres of relatively undeveloped land were needed to provide civilian safety and to prevent “unreasonable encroachment.” This is an admission that the Navy considers 30,000 acres a baseline need for a modern OLF. [1] At only 700 acres OLFC falls 29,300 acres short of such a standard, (i.e., having just 1/40 or 2.3% of the desired clear acreage). To see how unsuited OLF and its operations are to this standard, a 30,000-acre circle would be 3.8 miles in all directions from OLF's center. This circle would include the majority of the town of Coupeville, as well as numerous residences, parks, and facilities east and west of OLF. In fact, the east-west reach of such a circle would go beyond Whidbey's populated shores well into the waters of Puget Sound.

Yet mysteriously the Navy is year-by-year, decade-by-decade enjoying permission (granted by itself) to go full bore with increased operations (remarkably, with a now-proposed six-fold increase of these operations). Even more improbably, it is declaring an improbable “no significant impact” in the DEIS, seemingly finding no particular accident risk from its inadequate facility. Even 30 years ago, in 1987, there was worry by the Navy about the civilian encroachment and dangers but lack of will on the part of the Navy and Coupeville administrators let a move to a safer location languish. [3] Exacerbating the problem is that the County, with the Navy's tacit indulgence over the years, has not discouraged development in accident-prone APZ flight zones. Short Clear Zones are present at the runway ends, but these are in no way the required Accident Protection Zones (APZs) needed well *beyond* the ends of the OLFC runway Clear Zones in the low flight Noise Zone 2 areas. There the APZs have neighborhoods, assorted buildings, a bus fuel depot, farms, etc., loading the dice for a catastrophe. More detail in footnote [4].

The APZs are not clear because the County has not respected in its zoning the Navy's stipulation of no residences (zero) within a [high] Noise Zone 2 area, (which is arguably also more accident-prone due to near-rooftop plane trajectories). We now have the reality of over 600 residential homes and businesses in very real harm's way. In 2017 it is useless to argue whose negligence, Navy or County, has allowed these to be placed there, with no comment, dating several years ago. Furthermore, the low-level FCLP touch-and-goes mean that these loud planes fly over neighborhoods at altitudes well under 500 feet, in some areas as low as 200-300 feet. This is commonly frowned upon by the FAA as dangerous, so the conditions around OLF require the Navy to strongly bend (and break) reasonable safety margins once again in order to function at all in this tight Whidbey footprint.

- **Challenging, potentially dangerous atmospheric conditions:** Pilots land and take off often with a tailwind (discouraged for actual carrier landings that should be into the wind, but a common problem at OLF due to the chosen direction of flights using the pre-FCLP-positioned runway).



There are also frequent wind events, fog, and major rain events (that are less frequent in many US war theaters but a fixture at OLF). Mike Welding (T CIV NAS Whidbey Island, N01P) puts it this way: *“For Field Carrier Landing Practice (FCLP) operations at OLF... the pattern the pilots fly are intended to simulate as closely as possible, the approach and landing on an aircraft carrier. Aircraft carriers always have wind flowing over the deck as they sail at speeds that can approach 30 knots. At OLF, if the winds are out of the south, the best approach is from the north.*

In fact, winds at OLFC are predominantly out of the south (7-8 months of the year) causing frequent cancellations of scheduled FCLPs from fall through spring when those winds commonly exceed 5 knots. So, approach and takeoff should be from the north and into the wind. That means Path 14 should be used, but the Navy has indicated, and the Growler-use record has shown, that Path 14 is inadequate and rarely used, so FCLPs have to be fit into Path 32 on days when the southerly tailwinds are under 5 knots, even though in actual situations jets never land with the wind. Instead, jets landing on carriers come in against a 20 to 35 knot headwind, not a 5-knot tailwind. Even during the summer, when winds are generally negligible, FCLPs are rarely into any headwind.

Hence, wind conditions at OLFC simply are generally the opposite of the carrier landing conditions Mike Welding describes as real conditions pilots experience with carriers. Although the Navy theoretically restricts FCLPs at OLF to tailwinds of less than 5 knots, Growlers have been observed by civilians on a number of occasions practicing with tailwinds of up to 10 knots and on one occasion, about a 15-knot tailwind, a patently “stretching the limits” for maneuvers, this writer was assured by a Navy airman. Additionally these atmospheric conditions cause endless scheduling headaches, present more danger for training flights, and their inconvenient, hard-to-predict nature could cause a dangerous stretching or “fudging” of the acceptable window of safety for flights. All such risk-elevators must be evaluated in the EIS.

More about tailwinds: If a malfunction were to necessitate a full-stop landing, the ground roll would be significantly longer with a tailwind (1.5% per knot). Because the OLFC landing strip is only 5200 feet long, an aircraft needing to land could continue off the end of the runway. Directly ahead approximately 1/4 of the runway length, is Whidbey Island's Transit Fuel Depot, and then one more runway length further is the township of populated Coupeville. Loss of control in attempting to land could result in loss of aircraft crew and civilian residences or buildings in the crash zone of the runway. The other runway direction has the community of Admiral's Cove a runway length away as well. At a high approach speed of 160 to 180 knots (303 ft/sec), an out-of-control plane could reach the Fuel Depot (also many facilities and residences) in 17 seconds and, if flying low or with pilot ejection, the town of Coupeville in 34 seconds.

*More on the Density Altitude problem:* It is also worth mentioning that the Navy ignores the vast “density altitude” difference between OLF (d.a. 337) and typical Middle East sortie locations (Persian Gulf d.a.2182). Because aircraft behave according to density altitude rather than actual altitude, landing or taking off during high-density altitude conditions heavily influences approach speed, lift, and engine power output, changing length of landing roll and takeoff roll. This means fighters run the risk of hitting a Persian Gulf carrier deck too hard or missing it by flying too high with a pilot trained with the “feel,” despite instrumentation, of the wrong air conditions. On May 29, 2016, for instance, a Growler landing aboard the carrier John C. Stennis in the South China Sea engaged the carrier arresting gear while still in flight.[5] Result: millions in damage. Yakima training area, for instance, a proposed OLF alternative, has far greater clear area and, while 1400 feet above sea level, has a density altitude of 2963 (around that of the South China Sea). Could training there have prevented the costly Stennis accident? The EIS needs to evaluate such factors, caused by Coupeville OLF training, impinging on airmen's safety in the areas carriers traverse and battle.

*A note on the huge accident-risk reduction of an alternate field like Yakima (or others in CA, NV):* Risk considerations in an EIS must consider alternative actions that reduce risk. As an alternative, the Yakima training field (or others in CA, NV), for example, has near zero lethal civilian accident risk, infrastructure accident risk, and civilian health risk from Growler noise, or groundwater pollution risk (no aquifer running underneath it like at Coupeville). And such a field's bonus: while higher than sea level, it supports the plane's weight much more typically of war theaters than the OLF, thus adding to the safety of airmen flying missions in the middle east. Previous vetting of alternatives has overlooked many of these risk-lowering benefits (since, after all, risk was not even evaluated in the DEIS) and it appears that distance from Ault Field is one of Yakima's down-sides due to fuel limitations of the fighters. But aerial refueling is very common with the Growler missions—an everyday non-event. Yes, more expensive to fly crew further for training, but only a few percent so, and nowhere equivalent to the expense and risk to health and safety born by Coupeville residents *and even to the flying airmen.*

● **Birdstrikes are a risk:** It is well known that birdstrike risk is vastly increased with low flight. The Navy has shown concern for this accident risk by cutting down hedges and some trees and bushes surrounding OLF to discourage the small animals hunted by hawks. According to the DEIS the Navy calculated: “The NAS Whidbey Island complex...would have averaged between 58.7 and 139.5 aircraft-wildlife strikes annually during that period, most of which were birds. The estimated numbers of strikes (and actual number of reported strikes) are minimal relative to the 89,000 aircraft operations flown at the NAS Whidbey Island NAS Whidbey Island Complex... The NAS Whidbey Island BASH plan (NAS Whidbey Island, 2012) is, in large part, responsible for minimizing the numbers of strikes.” ...most strikes are reported at lower altitudes...and they are more susceptible to strikes during daylight hours. ...The increase in operations would result in an increase in the potential for aircraft-wildlife strikes.” The DEIS concedes that this risk must be part of an EIS and this potential must be converted to numerical risk in light of the proposed large number, 35,500 ops/year. Included in the calculation must be a percentage of crashes/incidents related to bird-strike numbers. The resulting probability must be added to the overall crash risk assessment along with all the other factors discussed in this paper that raise the probability of accidents. While no one probability may be gigantic, the accumulation of probabilities from the many sources of crash risk begin to be significant.

● **Hypoxia problems raise the risk probability.** According to the *Navy Times* 5/8/16: “*Nothing scares Hornet pilots more than losing oxygen — and it happens all the time.*” This article details the hypoxia (low oxygen) problem in the Growlers, which pilots have identified as their *top concern.*

“Naval Air Systems Command is scrambling to implement fixes, but the brass has underplayed the severity and frequency of the danger since it emerged in a February 2016 congressional hearing, according to interviews with pilots and official reports.”

“These show a troubling *rise* in the number of breathing and pressurization problems, and that Navy and Marine F/A-18 Hornet and EA-18G Growler aviators view the problematic On-Board Oxygen Generation System as the fleet's most pressing safety issue by far (10 times over). Despite these issues, aviation bosses have not grounded the fleet, a common response to aircraft safety issues.”

Rebecca Kheel - 02/04/16 in *The Hill* says that Air and Land Forces Subcommittee chairman Rep. Michael Turner (R-Ohio) asserts that the “symptoms related to depressurization, tissue hypoxia and contaminant intoxication overlap.”

He is concerned that in 2006 the 100,000 flight hour rate of hypoxia incidents was 3.66 in 2006, 5.5 in 2010-11, and then mushroomed to 43.6 in 2014-15. And Meghan Myers in the May 8, 2016 *Navy Times* affirms that 2016 shows no progress in mitigating this problem, with 2016 on track to top these numbers.

Alarming, Turner says “the cause of most physiological episodes is not readily apparent during

flight,” and “reconstruction of the flight event is difficult with potential causal factors not always readily apparent during post-flight debrief and examination.” Given all the other compounding risk factors mentioned here for OLF operations, hypoxia-induced, background mind-dulling can leave airmen without the awareness edge to cope with the heightened safety challenges at the airfield and with a reluctance to point to dulled mind conditions that might label them as not “the right stuff.”

It is not possible to ignore the widely known and deeply concerning hypoxia problem in an EIS. It is likely a background contributor to several of the 22 Growler and F/A-18E/F crashes since 2002 and certainly a factor in hundreds of “incidents” since 2006, but it may have been downplayed or misunderstood (See. Turner quote above) in many accident descriptions in that they only create a background cause of pilot error through causing misjudgment, disorientation, fatigue, and distraction.

- **Accident statistics generate a risk probability:** The accident risk evaluation must include probability predictions related to the statistics of crashes. It is challenging to choose which statistical factors best predict the likelihood of Growler accidents. One impressive statistic is that in the last 25 years the ratio of F-18 crashes to crashes of its predecessor the prowl is 13:1. The F-18 is a faster and more powerful airframe and more can go wrong in flight. [6] But not all F-18s are alike; there was a considerable re-design for the F-18E/Fs that the Growlers are a copy of but with electronic equipment. Some may argue that redesign made them more crash safe. So we can look at accidents just for these: crash records can be spotty on information but a good estimate is 22 crashes of these F-18s since 2002 of which 10 were midair collisions in training and 12 were a random mix of pilot error and mechanical failures that occurred in the air as well as during takeoffs and landings, often with ejections. [7] A ratio of crashes per the number of flight ops done with those models would help illuminate the EIS the crash risk at OLF. Midair collisions are less likely in FCLP training than in battle simulations but the other 12 crashes of these type had circumstances that could happen at or around OLF during FCLPs. It is a daunting task for this writer to gather enough data to consider the accident risk in relation to hours of flight training operations but this is what the writers of the EIS must consider to evaluate crash-risk at OLF. Computing even the primitive statistic of .84 crashes/year worldwide of this aircraft type tells us there is not a near-zero probability of a crash at OLF, given the crash-accentuating factors there. Of course, careful examination of the circumstances of each crash would help refine the probability estimates for OLF. Yes, the OLF has not suffered a catastrophic crash yet, but many circumstances present in the other accidents are even more pronounced in OLF's conditions and will be vastly amplified following the 6-fold increase in the number of flight ops predicted in the DEIS.

Another approach to crash-probability would be to look at all accidents since 2000 of fighters of all models flying in non-paired-combat-simulation training. Yet another would be to look at all accidents of fighters of all types flying FCLP training. Computing probabilities as a percent of total flight ops of this type would be revealing: they are beyond this writer's time and resources to gather but this information should be researched and used by the EIS writers. Yet another way to get a grip on accident risk: The All-Navy Class A Mishap Rate over the past ten years is 1.27 mishaps per 100,000 hours flown. What percent of these mishaps are *crashes* can be ascertained. At the flight-op rates projected in the DEIS, 116,500 ops/3 years, this translates 3-4 "mishaps" over the next 10 years (but undoubtedly a higher number than that due to the highly dangerous aspect of these flight ops compared to the majority of ops). It is very possible that at least one of these could be a crash disaster, but work with the “mishap” stats would put numbers on it--using the proportion of “mishaps” that are crash disasters throughout the Navy.

It is the Navy's obligation to choose the best estimation techniques, of which all of the above are examples, for crash disaster probabilities, then present it in detail in the EIS.

**Note on elevated probabilities:** It is important to keep in mind that the probabilities, regardless of which of these ways they are estimated above, are elevated by a) some of the unique atmospheric

and scheduling challenges of OLF discussed above and b) by the sixfold increase of operations presented as a preferred alternative. A sixfold increase in operations can easily create a higher-than-six-fold increase in crash potential due to the complicated interaction of factors like tight scheduling, support staff fatigue, more crowded airspace, cutting the safety window too closely for weather events, etc. In other words, it is not “if there is a crash disaster at OLF” but “when,” and the EIS, all about “impacts,” is legally required to describe the damage to life and property, and the disruption that follows, for the worst reasonably probable accident.

● **PFOS well-contamination connection:** There is an important causal connection between crash probability and the probability of water-table contamination by PFOS chemicals. Plane incidents cause PFOS to be applied on the ground in large quantities. Any threatening plane *mishap* may prompt the use of toxic PFOS foam (still stored at OLF and /Ault Field) to prevent a fire. It is disheartening that even though there has been critical PFOS contamination of wells in properties near OLF, originating at a well on the OLF, the Navy has chosen to store these toxics at its flight facilities to be used in the event of a potential or real actual crash. Because a water table feeding the Coupeville water supply is right underneath the OLF, the probability of PFOS contamination of the water table by its use on the field (or in the civilian vicinity) should also be calculated. (PFOS chemicals have already entered the water table from past activity so the probability is not zero.) This must be done by multiplying the probability of a fire-threatening mishap at OLF by the probability that PFOS chemicals sprayed on the field will penetrate to the water table and contaminate it. This is a definite computation for the EIS.

#### FOOTNOTES

[1] A calculation of the need for a whopping, schedule-crowding 183 training days per year, i.e., 1/2 year. This calculation is for the projected 6-fold increase of flight operations proposed in the DEIS.

Growler Squadrons currently have five Growlers each and the DEIS proposes adding either two or three Growlers to each VAQ squadron; meaning a squadron would then deploy with seven or eight planes. A pilot typically requires, on average, 150 “bounces” (a simulated carrier landing) to become proficient at one of the most challenging tasks in aviation. For a squadron of 8 planes, this totals 1200 bounces and is counted as 2400 Flight Operations in the DEIS. The DEIS further explains that a typical FCLP lasts 45 minutes with three to five aircraft participating the training.

Using an average of four planes per exercise, 45 minutes would permit 8-10 FCLP loops per session, or a total of 32 to 40 FCLP landings and takeoffs. If there are few minutes between sessions, one could assume a session occupies an hour, therefore, the number of sessions required to train a squadron equals the number of hours of FCLP required. This totals about 24 hours for a 5-jet squadron and 37.5 hours for an 8-jet squadron. At three training sessions per day, each day has 96 bounces.

The training scenario outlined above would occur for 8-10 days over a two-week period to prepare all pilots in a five-jet squadron for deployment. Alternative 1A in the DEIS would generate 183 days of training using the scenario described above, approximately two weeks of training followed by two weeks of no activity, on average, in order to accommodate the larger squadrons.

[2] “For purposes of analysis, an estimated 25,000 to 30,000-acre area is being considered for each site location alternative.” <http://web.archive.org/web/20090712085059/http://www.olfeis.com/about.aspx>

[3] A 1987 report recommended alternatives to OLFC be investigated by the Navy because of the encroachment issue. Instead, to putatively “resolve” the encroachment matter and iterative need to get around issuing temporary waivers, Navy administrators dubiously issued a permanent waiver for OLFC use.

[4] The Navy’s 2005 Air Installation Compatible Use Zones (AICUZ) analysis concludes that the area surrounding OLFC is “largely rural.” That is a contrived mischaracterization. The AICUZ stipulates that within the 65-dB noise contour (Noise Zone 2) there should be no residences and only very

restrictive other uses. (Remember, this zone 2 noise contour is a higher accident risk in that jets are close overhead and are undergoing the delicate adjustments of takeoff and landing.) Yet within that noise contour (+accident risk-zone) are over 1000 residences, a heavily used County recycle center, an Olympic-sized outdoor swimming pool at Admirals Cove, a new federally funded transit facility with above ground fuel storage tanks, Island County's Rhododendron Park for youth soccer and softball events, a newly constructed animal shelter, and a heavily used dog park. And last but not least, there was a very nice but economically failing motel that has just recently been sadly purchased as a residence for homeless youngsters, and it lies directly adjacent to the dangerous takeoff area, one of the loudest (most accident risk) portions of the racetrack (110-120 dBA).

[6] <http://www.military.com/daily-news/2016/06/01/navy-growler-damaged-during-carrier-landing-in-south-china-sea.html>

[6] <http://citizensofeyebysreserve.com/blog/growler-jets-36-times-more-likely-to-crash-than-prowler-jets/>

[7] [https://en.wikipedia.org/wiki/List\\_of\\_accidents\\_and\\_incidents\\_involving\\_military\\_aircraft\\_\(2000-09\)](https://en.wikipedia.org/wiki/List_of_accidents_and_incidents_involving_military_aircraft_(2000-09))

[https://en.wikipedia.org/wiki/List\\_of\\_accidents\\_and\\_incidents\\_involving\\_military\\_aircraft\\_\(2010%E2%80%93present\)](https://en.wikipedia.org/wiki/List_of_accidents_and_incidents_involving_military_aircraft_(2010%E2%80%93present))

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To: EA-18G Growler EIS Project Manager Naval Facilities Engineering Command Atlantic 6506 Hampton Boulevard Norfolk, VA 23508 Attn: Code EV21/SS From the DEIS, page 4-261: "... While it is generally difficult to project future safety/mishap rates for any aircraft, the Growler has a well-documented and established safety record as a reliable aircraft." This quote is the extent of effort expended on an accident risk analysis in the DEIS! Yet a thorough risk analysis (despite being "difficult to project") must accompany every credible EIS. An EIS must include treating a "maximum foreseeable" (different from worst-case) accident, its probability of happening, its potential adverse consequences and its means and costs of remediation. The magnitude of a risk must be calculated as the product of its probability and its consequences; comparisons of risks for each alternative proposed should be done. Stating "reliable aircraft" and "well-documented safety record" in the DEIS in no way acknowledges or documents the very real potential for a catastrophic flight incident at OLF. The DEIS writers somehow found it convenient to withhold important statistics (like the 22 crashes since 2000 of the EA-18G and its closely related F/A-18 E,F aircraft) from the DEIS. It also omitted several aggravating factors at OLF that are conducive to catastrophic accidents, capable of endangering the populace, the environment, local properties and indeed, the airmen themselves. The EIS accident risk analysis for all four action alternatives must include obvious risk factors. Some of these are facility shortcomings, unique Whidbey atmospheric challenges, scheduling compromises, contributors to pilot error like night flying, and the very significant and pernicious Growler technical problem, the hypoxia conundrum (on steady rise in the last eleven years) that continues to dog the Growler, its flyers and its engineers. Furthermore an EIS must include with its accident probabilities the potential harms and disruptions resulting from accidents of various levels of complexity and intensity. Since risk is defined as level of consequences multiplied by probability of occurrence, the more flight operations projected the more probability of crashes and the more risk. Omitting a risk analysis falsely engenders a tone of unrealistic optimism that challenges credibility. This DEIS puts forth options to multiply flight operations sixfold (amplifying the probability of crashes at least sixfold) yet robotically and blithely pronounces the same "no significant impact" mantra it intoned for the far lesser operation hours. Mathematical reality: dramatically amplifying flight operations will severely escalate the probability of a significant deadly, destructive "impact." This response will consider in detail the following EIS-omitted factors that are amplifiers of, and results of, accident risk. (See further detail below for each of the bulleted items):

Compromises on facilities: A runway 25% shorter than Navy-required Growler runway-length. 1/40 or 2.3% of regular Navy-required open acreage surrounding the runway Residences, a bus fuel-depot, businesses, county facilities, a highway and a city are under runway approach paths and many are within what should be uninhabited accident-risk zones at runway ends. Atmospheric conditions: Frequent wind shifts, creating dangerous tail-winds for allowed FCLPs. (Tailwinds are avoided for carrier landings.) Some civilian spectators have witnessed FCLPs with tailwinds exceeding strict tailwind-speed regulations. Amplified risks from Whidbey's extensive bird life potentially interfering with low level flight ops over water and near forest and hedge areas. Frequent fog, rain events, and wind shifts that could force "edgy" "flight on" calls for desperately

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children

needed, time-sensitive training flight allocations. This is occasioned by the crowded calendar forced by a 6-fold amplification of flight op numbers. (Maximum projections of flight ops in the DEIS would require half the days of the year—183 days—for required flights. This means decreasing the safety envelope around ever-shifting Whidbey atmospheric conditions to the bare minimum to fit flights into a demanding schedule. A vast “density altitude” difference between OLF (d.a. 337) and typical dry Middle East sortie locations (Persian Gulf d.a. 2182). While not endangering pilots in OLF training, it endangers them in a war theater: it increases their risk of hitting a Persian Gulf carrier deck too hard or not soon enough by misjudging the lift of air tht is vastly different from that in their OLF training. Pilots and planes – circumstances contributing to risk: Night flights with tired pilots (tiredness welcomed for realistic practice). The troubling rise in the number of breathing and pressurization problems in FA-18G and its close relatives the FA-18E/F; the pilots rate the Growler's tendency toward hypoxia their most pressing problem. Pilots are trainees learning new, dangerous maneuvers, automatically increasing accident risk above routine flights done by seasoned pilots. The Growlers are part of a family of similar planes that have a significant accident rate (despite the “well-documented and established safety record” stated in the DEIS). This rate becomes part of the accident probability for OLF. Effects of catastrophic accidents on the Whidbey Island Community An EIS must state the risk of accidents AND their secondary consequences. Dispersal into the water table of the fire-fighting Type B foam with health-endangering, banned, toxic ingredients is one of these. Training and accidents have already injected PFOS chemicals these into the Whidbey water table, rendering some vital citizen wells unusable, and endangering the Coupeville water supply (toxins present but barely below a dangerous level). These banned toxins are still being stored for emergency use on Whidbey; increased flight ops will amplify risk of their usage and thus endanger the water table that is directly under the OLF. Because FCLP practice is taking place in a crowded occupied area, results of a crash are multifold amplified beyond those of a crash in an open desert area. Economic, health and infrastructure damage becomes a major part of the risk equation: consequences times probability = risk, meaning that even risk probabilities that might be tolerated in an uninhabited desert setting become intolerable within a civilian-populated setting.

Langley, WA 98260

To: EA-18G Growler EIS Project Manager Naval Facilities Engineering Command Atlantic 6506 Hampton Boulevard Norfolk, VA 23508 Attn: Code EV21/SS From the DEIS, page 4-261: "... While it is generally difficult to project future safety/mishap rates for any aircraft, the Growler has a well-documented and established safety record as a reliable aircraft." This quote is the extent of effort expended on an accident risk analysis in the DEIS! Yet a thorough risk analysis (despite being "difficult to project") must accompany every credible EIS. An EIS must include treating a "maximum foreseeable" (different from worst-case) accident, its probability of happening, its potential adverse consequences and its means and costs of remediation. The magnitude of a risk must be calculated as the product of its probability and its consequences; comparisons of risks for each alternative proposed should be done. Stating "reliable aircraft" and "well-documented safety record" in the DEIS in no way acknowledges or documents the very real potential for a catastrophic flight incident at OLF. The DEIS writers somehow found it convenient to withhold important statistics (like the 22 crashes since 2000 of the EA-18G and its closely related F/A-18 E,F aircraft) from the DEIS. It also omitted several aggravating factors at OLF that are conducive to catastrophic accidents, capable of endangering the populace, the environment, local properties and indeed, the airmen themselves. The EIS accident risk analysis for all four action alternatives must include obvious risk factors. Some of these are facility shortcomings, unique Whidbey atmospheric challenges, scheduling compromises, contributors to pilot error like night flying, and the very significant and pernicious Growler technical problem, the hypoxia conundrum (on steady rise in the last eleven years) that continues to dog the Growler, its flyers and its engineers. Furthermore an EIS must include with its accident probabilities the potential harms and disruptions resulting from accidents of various levels of complexity and intensity. Since risk is defined as level of consequences multiplied by probability of occurrence, the more flight operations projected the more probability of crashes and the more risk. Omitting a risk analysis falsely engenders a tone of unrealistic optimism that challenges credibility. This DEIS puts forth options to multiply flight operations sixfold (amplifying the probability of crashes at least sixfold) yet robotically and blithely pronounces the same "no significant impact" mantra it intoned for the far lesser operation hours. Mathematical reality: dramatically amplifying flight operations will severely escalate the probability of a significant deadly, destructive "impact." This response will consider in detail the following EIS-omitted factors that are amplifiers of, and results of, accident risk. (See further detail below for each of the bulleted items):  
 Compromises on facilities: A runway 25% shorter than Navy-required Growler runway-length. 1/40 or 2.3% of regular Navy-required open acreage surrounding the runway Residences, a bus fuel-depot, businesses, county facilities, a highway and a city are under runway approach paths and many are within what should be uninhabited accident-risk zones at runway ends. Atmospheric conditions: Frequent wind shifts, creating dangerous tail-winds for allowed FCLPs. (Tailwinds are avoided for carrier landings.) Some civilian spectators have witnessed FCLPs with tailwinds exceeding strict tailwind-speed regulations. Amplified risks from Whidbey's extensive bird life potentially interfering with low level flight ops over water and near forest and hedge areas. Frequent fog, rain events, and wind shifts that could force "edgy" "flight on" calls for desperately

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
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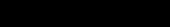
## 1.a. Thank You

Victoria, British Columbia V8P3P8

As a lifetime resident of Great Victoria I have grown up with the occasional thundering sounds from Whidbey Island. While the sounds are very notable near the ocean, they dissipate elsewhere in the city, particularly when drowned out by other sounds such as traffic. The sounds are not offensive to me and it provides me with comfort to know that there is military presence of our closest ally geographically close to us.

Seattle, WA 98105

I have just learned that the Navy plans to use parts of the Olympic Peninsula into a warfare training ground. This should never happen for numerous reasons. First, they intend to have periodic unannounced closures of the Olympic National Parks in order to do mock warfare. Really? The public uses the parks regularly - planned vacations and unplanned vacations. Second, These Growler planes can produce 150 decibels of sound, enough to cause instantaneous hearing loss, in both humans and wildlife. Effects from loud noise include hearing loss, increased stress hormones, cardiovascular disease, immune system compromise and behavioral/psychosocial impacts. Ground equipment for the planes emit intense electromagnetic radiation associated with all kinds of other health concerns. Third, But most important from a climate perspective, each jet burns 1304 gallons PER HOUR and produces 12.5 metric tons of CO2 per hour! Just for perspective that is 23% more than the ANNUAL CO2 emissions of a WA state citizen! (Then multiply by up to 118 jets x 260 days a year 14-16 hours a day, at altitudes as low as 1000 feet) This is outrageous that to practice war we would destroy the beautiful peninsula and our planet! Our planet cannot afford these kind of "games". Fourth, 1 billion birds (already threatened by climate change) fly up and down the pacific coast using it to navigate. This will cause harm to those birds. Definitely stop this plan to protect all lives and our planet.



- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.l. Bird Migration
- 18.b. Average Carbon Dioxide per Aircraft
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

1.a. Thank You  
10.c. Wildlife Sensory Disturbance and Habituation



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation *pt community member*

3. Address [REDACTED] *PT Townsend WA 98368*

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

*Dec 5, 2016*

*my opinions & comments are motivated & driven by personal wisdom through experience over 6 1/2 decades in this country & love and respect in so many ways. Quite simply, I am concerned with the impact the Growler Airfield operations have on wildlife on this peninsula. Minimal Habitats*

Please print • Additional room is provided on back  
Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

and "Major Sensory Disturbance Effects" are not significant??

This peninsula should not be disturbed by further military encroachment. Please take the side of the animals, habitat and all living beings beside human into consideration for once.

Thank you,



For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Clinton, WA 98236

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Clinton , WA 98236

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment.

Clinton , WA 98236

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.



Clinton , WA 98236

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Greenbank, WA 98253

Summary The Draft EIS is inadequate in several crucial respects. It does not contain sufficient information on Action Alternatives, water pollution, the health effects of Growler noise, and socioeconomic impacts. The current situation, or the No Action Alternative, has already created significant health and socioeconomic issues because of water and noise pollution, yet even the publicly available information on the current situation is inadequate. Before proceeding with a final EIS, and before any further Growler training operations on Whidbey, the Navy should take the steps described below in each referenced category and make public all specified information on the risks to Whidbey's public health and economy. Action Alternatives The Draft EIS summarizes the considerations that led to the decision to locate all Growler training at NAS Whidbey without discussing how those considerations apply to alternative sites and to the selection of Whidbey. The Draft EIS should instead contain (1) a list of alternative training sites and, for each, an explanation as to why the alternative site was deemed unsuitable; and (2) an explanation as to why the Navy's considerations do not include the fundamental military principle of dispersion of forces. The Proposed Action has exacerbated cultural and political divisions on and around Whidbey and even cut across political lines, angering thousands of people around the northern Puget Sound. In such a climate it would be wise for the Navy to explain, in much greater detail than it has, why it must inflict additional serious damage on the Puget Sound. Water Resources The Draft EIS contains nothing on the tests of wells in the vicinity of Ault and OLF that have tested positive for toxic pollutants (PFOA and PFOS among others) that the Navy has released into local ground water and aquifers. The Draft EIS should contain (1) a detailed description of the test results for all water tests and a list of planned future tests; (2) an undertaking by the Navy to maintain long-term, periodic and thorough testing of wells and locations within varying distances of Ault and OLF to determine the location, size and direction of the plume(s) of all pollutants and their concentrations and (3) an undertaking by the Navy to use no pollutants in the future and to participate in creating a plan by all stakeholders to reverse the pollution and protect Whidbey's wells and aquifer(s) from further pollution by the Navy. Such a plan is essential not only to civilian well-being but also to the Navy's long-term interests on Whidbey. Noise The Draft EIS states: "Therefore, the Proposed Action would have a significant impact on the noise environment as it relates to aircraft operations at Ault Field and OLF Coupeville" (ES-5). It also states: "No studies have shown a definitive causal and significant relationship between aircraft noise and health" (3-22; see also 4-79 re nonauditory health). The Draft EIS appears to base this conclusion on air industry studies (see, e.g., "Potential Hearing Loss" and "Nonauditory Health Effects"), and Navy noise measurement data. Nowhere, however, does the Draft EIS contain any description of the health effects of the Growler itself. So conclusions about the health effects of Growler noise are drawn from general studies rather than from studies specific to the Growler, even though the Growler is widely recognized as an exceptionally loud aircraft and the Navy has health data specific to the Growler. Data specific to the Growler is available to the Navy from its own medical files of active - duty and retired Growler air crews and ground crews as well as from the Navy's records of community complaints. The Navy reportedly assumes that 100% of its personnel working on the Growler will suffer significant disability, not confined to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.k. Range of Alternatives
  - 2.l. No Action Alternative
  - 2.m. Record of Decision/Preferred Alternative
  - 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

permanent hearing loss. Moreover, complaints from civilians affected by Growler operations contain evidence that Growler noise causes varieties of serious harm. These reports describe, among other things, shock and sleep loss, significantly elevated blood pressure, internal organ damage, and debilitating related psychological problems. The Navy has written and electronic records of these complaints. The Draft EIS is also inadequate with respect to: (1) the methodology of measuring sound, where it averages decibel levels over longer periods of time than when they actually occur; and (2) descriptions of sleep disturbance and its health effects. For noise measurement, the Draft EIS's approach is confusing and inappropriately complicated and contradicts common experience. To reflect actual experience, noise should be measured for each event, by decibel level(s) and actual duration of the event. For sleep disturbance, the effects of traumatically loud noise, where disturbance is repeated enough and unpredictable enough to put the victim in a state of shock or psychosis – these effects are much more dire and life-shortening than as described in the Draft EIS. Loud noise and sleep disturbance are common, effective torture techniques for destroying mental health and reducing victims to total incapacity; the Draft EIS should recognize such serious health problems. The Draft EIS should (1) describe with specificity what is contained within the Navy's records concerning the health effects of Growler noise on Naval and civilian personnel; and (2) contain an undertaking by the Navy (a) not to exceed a specified number of noise events over 60 decibels over Ault and OLF, as determined by independent medical experts, and (b) to provide (i) warning signs around all relevant operational areas and (ii) permanent medical and psychological services to affected Naval and civilian personnel. Socioeconomics The Draft EIS recognizes no significant socioeconomic detriments that would result from the Proposed Action. Yet farmers in Coupeville have publicly stated that Growler training noise seriously damages their operations, and at least one major farmer has announced plans to cease operation if the Proposed Action occurs. Farming and tourism are two notable Puget Sound industries that are seriously damaged by current Growler training flights and certainly would be damaged by any increased flights, particularly over Coupeville. Residential real estate values have already been materially degraded by current Growler flights. The Draft EIS should specifically describe and value all harms that will result from the Proposed Action, such as: pollution of Island ground water and aquifer(s); exacerbation of Island County's poor economic diversification (over-dependence upon the Navy as an employer and source of income); loss of tourism; loss of farming; burdening of the public school systems and social services; reduction of available rental and owned residential real estate; increased health care costs, etc. Scenarios Based upon the current situation, the Navy should remove all Growler training flights to sparsely populated regions. Absent a total removal of Growler training flights, the Navy should follow the No Action Alternative coupled with new mitigation and remediation actions that radically reduce current damage from Growler flights. If the Navy proceeds with the Proposed Action despite additional damage to the people and businesses of the northern Puget Sound, then Scenario C, with the smallest number of flights over OLF, is the least damaging Scenario. This is because, in terms of the businesses and residents affected, those around Ault Field are already surviving with few public complaints under current Growler operations. Northern Whidbey's political leadership has embraced Growler operations without qualification and denigrated and tried to intimidate any Island County residents and officials who are opposed or even sceptical. By contrast, most of Central Whidbey's community is unhappy with Growler operations and would welcome the complete closing

of OLF. February 21, 2017 [REDACTED], Greenbank, WA 98253

[REDACTED]

*This was also sent electronically*



Home Proposed Action Project Schedule Current EIS Documents Historical Documents Public

## COMMENTS

All written comments must be postmarked or received (online) by February 24, 2017, to ensure they

Thank you for your interest in providing comments on the Environmental Impact Statement (EIS) for EA-18C Station (NAS) Whidbey Island. To be addressed in the Final EIS, comments must be submitted by February reviewed by the Navy and responded to in the Final EIS.

PLEASE NOTE: Personally identifiable information of individuals who provide comments will be kept confide by law. The city, state, and 5-digit zip code of individuals who provide comments may be released.

First Name:

Last Name:

Agency/Organization:

City/Municipality:

State/Province:

Zip/Postal Code:

Comments:

Would you like to join the mailing list for future updates?

[You will be redirected to the mailing list form upon sut

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Privacy Advisory: Please refer to the [Privacy Policy](#) that describes how your information will be used.

Submit

Written comments may be mailed to:

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

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This is an official [U.S. Navy](#) web site.

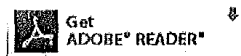
The United States Fleet Forces Command is the official sponsor of this project website. Questions regarding Fleet Forces Command Affairs Officer, Mr. Ted Brown, at (757) 836-4427.

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1562 Mitscher Avenue, Suite 250  
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This page was last updated on Monday, January 16, 2017.

Visitors: **00053064**

### Summary

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The current situation, or the No Action Alternative, has already created significant health and socioeconomic issues because of water and noise pollution, yet even the publicly available information on the current situation is inadequate. Before proceeding with a final EIS, and before any further Growler training operations on Whidbey, the Navy should take the steps described below in each referenced category and make public all specified information on the risks to Whidbey's public health and economy.

### Action Alternatives

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### Noise

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states: “No studies have shown a definitive causal and significant relationship between aircraft noise and health” (3-22; see also 4-79 re nonauditory health). The Draft EIS appears to base this conclusion on air industry studies (see, e.g., “Potential Hearing Loss” and “Nonauditory Health Effects”), and Navy noise measurement data. Nowhere, however, does the Draft EIS contain any description of the health effects of the Growler itself. So conclusions about the health effects of Growler noise are drawn from general studies rather than from studies specific to the Growler, even though the Growler is widely recognized as an exceptionally loud aircraft and the Navy has health data specific to the Growler.

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The Draft EIS should (1) describe with specificity what is contained within the Navy's records concerning the health effects of Growler noise on Naval and civilian personnel; and (2) contain an undertaking by the Navy (a) not to exceed a specified number of noise events over 60 decibels over Ault and OLF, as determined by independent medical experts, and (b) to provide (i) warning signs around all relevant operational areas and (ii) permanent medical and psychological services to affected Naval and civilian personnel.

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farming; burdening of the public school systems and social services; reduction of available rental and owned residential real estate; increased health care costs, etc.

Scenarios

Based upon the current situation, the Navy should remove all Growler training flights to sparsely populated regions. Absent a total removal of Growler training flights, the Navy should follow the No Action Alternative coupled with new mitigation and remediation actions that radically reduce current damage from Growler flights.

If the Navy proceeds with the Proposed Action despite additional damage to the people and businesses of the northern Puget Sound, then Scenario C, with the smallest number of flights over OLF, is the least damaging Scenario. This is because, in terms of the businesses and residents affected, those around Ault Field are already surviving with few public complaints under current Growler operations. Northern Whidbey's political leadership has embraced Growler operations without qualification and denigrated and tried to intimidate any Island County residents and officials who are opposed or even sceptical. By contrast, most of Central Whidbey's community is unhappy with Growler operations and would welcome the complete closing of OLF.

February 21, 2017

[REDACTED]

[REDACTED]

Greenbank, WA 98253

[REDACTED]

[REDACTED]

Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

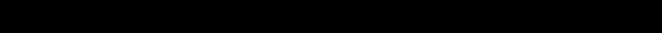
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name 

2. Last Name 

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Lopez Island, WA 98261

5. E-mail 

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

I live on the north end of Lopez Island  
and it can be quite noisy at times.  
It is unbelievably loud on the  
south end. And often,  
Has brought down the quality of life  
by quite a bit, and probably real estate value



All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

Sounds made by growlers is unhealthy. Hearing loss and a result of unnecessary aircraft is not OK. It impacts me directly as I am suddenly awakened in terror when one fly by my house. It's hard to get back to sleep, as my nerves are shot. This is a common occurrence for those who live in the path of these existing growlers. To add more to the air would be 30 times worse.

As a taxpayer I oppose the increase in growlers, and I oppose the ones already there. The National Parks are public lands. I own them as much as you do. To allow growlers in the air space of a National Park, abuses the whole intent of Park system. If I get terrorized out of my sleep in my own house, think about the animals and humans who are there for peace & quiet, tranquility and meditation, being tormented and tortured by the mere existence of this deafening aircraft.

NO MORE GROWLERS.

Thank you for taking the comments of the American People into consideration.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command (NAVFAC)  
 6506 Hampton Blvd, Norfolk, VA Atlantic  
 Attn: Code EB1/SS 23500

29.7

As you know, NAS Whidbey is proposing to increase EA-18G Growler flights in the Puget Sound region. Jefferson County's Marrowstone Island was not included in the Draft Environmental Impact Statement (DEIS) despite our close geographic proximity to Whidbey Island. As a resident, I frequently see and hear the jets during their training sessions. I hear the long hours of touch and go exercises at OLF Coupeville, which often last late into the night. I see the jets flying over my home, and even down Killisut harbor. Thus the Navy's proposal to increase Growler flights from 91 hours to 650 hours, a seven fold increase, has caused me concern.

In particular, I am concerned about:

- The total lack of inclusion of Marrowstone Island in the Draft Environmental Impact Statement.
- The risk of hearing loss from prolonged exposure to high decibel noise.
- Potential impacts on local wildlife, including bird strikes on waterfowl, as well as disruption of breeding seabird and marine mammal populations.
- Loss of sleep and the emotional/mental health effects of prolonged low frequency noise exposure.
- The effects of jet emissions and unburned jet fuel on human and environmental health.
- The anticipated impact on our recreational and tourist-based economy. Marrowstone Island is the home to Fort Flagler and Mystery Bay State Parks, as well as a number of resort-based businesses, and none of these were included in the DEIS.
- The impact on real estate values for Marrowstone Island. Significant aircraft noise has been proven to decrease property values. This is not addressed in the DEIS. I have concern about potential future disclosure requirements for property rental and sales transactions.

I feel that Marrowstone Island will be significantly impacted by the proposed increase of EA-18G Airfield Operations at NAS Whidbey Island. The current Draft EIS does not include our community in any way in its assessment. Please help ensure that the final EIS is accurate, and covers all of the residents impacted. I feel that our health and well being, along with that of our natural environment, is as critical as our military's operational readiness.

One option that is not addressed in the DEIS is considering an alternative or additional site for Growler operations. With the high dependence of our region on recreation and tourism, as well as the hundreds of thousands of residents in the area directly surrounding NAS Whidbey Island, it seems reasonable to explore the option of locating at least some of the Growler training to other, less impacted, areas of the country. It is the thorough assessment of impact and careful consideration of options that will allow the best decision to be made for maintaining our quality of life, the health of our environment and the security of our country.

Thank you for helping Washington State to be a safe, healthy, and peaceful place to live.

Sincerely,

Printed Name: \_\_\_\_\_ Address: \_\_\_\_\_

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 10.m. Impacts to Marine Species and Habitat
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.e. Field Carrier Landing Practice Patterns
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 7.d. Recreation and Wilderness Analysis and Study Area



## Concerns Regarding the Increase of EA-18G Growler Activity at NAS Whidbey Island

### Sleep Loss Due to Growler Noise.

The Draft Environmental Impact Statement (DEIS) fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...”. The EA-18G has a noise signature with elevated low frequencies. According to the AMA and World Health Organization, repeated exposure to high sound levels at these frequencies is detrimental to long term human health. Sleep disturbance can result in serious physical symptoms such as cognitive impairment, impaired immune system, short-term memory loss, adverse birth outcomes, risk of heart disease, risk of diabetes and lack of sleep. The DEIS should clearly address the impacts of sleep disturbance on residences affected by Growler night operations.

### Effects on Wildlife ✕

Marrowstone Island is home to a significant population of waterfowl, both resident and migrating. This includes a significant colony of nesting Caspian Terns. A resident population of over 200 harbor seals use Rat Island, adjacent to Indian Island Naval Magazine, for haul-out and as a nursery. Increased Growler overflights have the potential to disturb wildlife, impact breeding populations, and increase the hazard of bird strikes. The impact of increased jet noise on Marrowstone Island’s wildlife has not been outlined in the DEIS.

### Inaccurate Use of Noise Models in the DEIS

Noise estimates detailed in the DEIS are based solely on inaccurate modeling that shares little relationship to actual measured ground-level noise impacts. The National Park Service, which oversees Ebey’s Landing National Historical Reserve, measured actual aircraft noise within the Reserve boundaries over a one-month period in 2015 and determined that the park has the highest man-made noise of any national park in the contiguous 48 states. The noise measurements observed exceed the Navy’s simulated noise estimates used in the EIS by 20–30 dB, which is a factor 10 to 100 on a logarithmic scale. Since noise is a large component of this project’s impact, it is imperative that the final EIS include accurate, exhaustive and actual sound data. A good example of the failure of the DEIS sound models to accurately assess the impact is the fact that Marrowstone Island was not included in the impact area, despite the fact that we clearly hear and are affected by the current activity of the AE-18Gs.

### No Comprehensive Review of Impacts to Marrowstone Island ✕

The DEIS omits potential costs of the project, to the residents of Marrowstone Island and the surrounding area, from its analysis. These include lowered property values, economic impacts from reduced tourism, classroom disruption in area schools, and health impacts and sleep loss from dramatic increases in low frequency noise. We suggest that increasing flights over dense civilian populations, such as are found in Puget Sound, represents an avoidable harm imposed on large numbers of people, many of whom strongly support our nation’s military. The consideration of alternative AE-18G training sites in more sparsely populated areas should be considered as one of the alternatives in the final Environmental Impact Statement.



From: [REDACTED]  
 Subject: Welcome to the Quietest Square Inch in the U.S. | Outside Online  
 Date: February 9, 2017 at 12:50 PM  
 To: [REDACTED]

Welcome to the Quietest Square Inch in the U.S.



What crawlers fly —  
 How dare we?  
 Animals  
 are powerless  
 ! cannot  
 fight back  
 please  
 protect  
 nature  
 =====

Reaching the quietest square inch of land in the U.S. is literally a walk in the park. Well, a rainforest, to be precise. To find it, you hike along the Hoh River in the heart of Olympic National Park, past bigleaf maples carpeted in spike-mosses and around epiphytic ferns sprouting out of the saturated Northwest soil. Eventually you pass through the split trunk of a Sitka spruce to enter an even muddier, mossier, more verdant nook of the forest. Look to your left and you may notice a tiny red pebble resting on a mossy nurse log, marking 47°51'57.5"N, 123°52'13.3"W. That's America's quietest wild place.

The quietest inch isn't a sound vacuum. It represents a place with a minimum of human-made noise. The discipline of acoustic ecology, which is dedicated to understanding the natural sounds that come through loud and clear when we're not around, outlines an important distinction between sound and noise. The blip of water droplets from a forest canopy? Sound. The tinny din of Taylor Swift through smartphone speakers? Noise. For example, the inch, as it's often called, is exposed to flute-like bugling from Roosevelt elk, the Morse-code chirp of the American Dipper, and assertive hooting from the endangered Northern Spotted Owl. The steady rush of the Hoh River rounding the shoulder of Mount Olympus whooshes nearby, and summer snowmelt punctuates the setting with staccato droplets. In spite of the natural sound, dense forest engulfs the inch in a hush that is, at times, below 20 decibels—quieter than most recording studios.

The red pebble was put in place in 2005 by [Gordon Hempton](#), a 62-year-old Emmy Award-winning acoustic ecologist in Washington State who has been recording natural soundscapes for more than 35 years. He switched from merely studying sound to actively protect quietude ten years ago, when he spontaneously lost his ability to hear. The lull in his ears arrived out of nowhere and he's still unsure of the cause, though doctors suggested it could have come from an infection or immune system issue. "It sounded like the whole world was an AM radio station as heard from a garden hose," Hempton says. "Besides being immediately out of work, I was cut off from the world I loved. I was depressed."

Hempton's hearing began to return 18 months later—again out of nowhere—and shortly thereafter, he made it his personal mission to visit natural spaces in all 48 continental states in search of the quietest place he could find. Though he didn't measure decibels in every square inch of the country, he experienced enough of them to know true quiet when he heard it. He marked his choice with that red pebble, three miles into Olympic National Park, and named the spot [One Square Inch of Silence](#) (OSI). It's the rare place in America that is absent of human-made noise for up to 20 minutes at a time. OSI represents an independent research project meant to demonstrate how one spot of silence can positively impact its surroundings the same way that constant loud noise can alter nature's normal soundscape and disturb wildlife. Quietude is a valuable natural resource, Hempton argues.



The original red stone marking the quietest square inch in the United States, in Olympic National Park. It was stolen by vandals in 2009. Photo: Gordon Hempton

But on the 10th anniversary of the quietest inch, noise in Olympic National Park continues to grow into a worrisome crescendo of sorts. The main offender: aircraft soaring overhead. The low whirr of planes flying in and out of Seattle-Tacoma International Airport just 40 miles to the east and the intermittent blasts from fighter jets at the nearby Naval Air Station on Whidbey Island are disturbing the area. The thunderous jet engines roll through the sky above the inch every 20 minutes on average, according to Hempton's measurements—that's down from an hour in 2005, and quickly shrinking.

Hempton admits that one inch of quiet by itself may not be such a disastrous thing to lose, but he says OSI represents a cutting-edge effort to finally put a value on natural silence. To preserve it, Hempton has been petitioning the National Parks Service, sending letters to commercial airliners, and rallying local residents. His goal: establish a "quiet reserve" in Olympic National Park as a model for other parks to follow. These would be places free of noise from airplanes and other human-created audible disruptions—similar to how dark sky reserves ban streetlamps. If he fails, Hempton says, we may be sounding the death knells of natural sound for good. "Unless something is done, we'll see the complete extinction of quiet in the U.S. in our lifetime."

Before the advent of the portable cassette recorder in the late 1960s, scientists who wanted to capture, say, a birdsong in the field had to come prepared with a hefty load of backup batteries, tapes, and large recording devices. The improvements in recording technology allowed for the growth of a new discipline of what was then called soundscape ecology in the U.S. and Europe. Nascent sound scientists were tasked with gathering field recordings of nature's auditory ensemble—for example, the sound of an Alaskan arctic lagoon, complete with birdsong, wind, and the trickle of glacial melt—then using them to study the relationship between sound and functioning ecosystems.

As interest in constructing a vast library of sounds grew, the concept of charting noise pollution was also gaining attention. A groundbreaking 1993 news dispatch from Sweden detailed its horrifying effects on wildlife: when a military jet flew over a zoo, animals ate 23 of their own babies as a protective response. (Those affected included Siberian tigers, foxes, and lynxes.) Studies have since shown that animals carve out sonic "niches" in order to hear mainly the information they need for mating, navigating, hunting, and not being hunted. "To interrupt that information flow, even for a few brief seconds, is dangerous," Hempton says. When exposed to sudden bursts of unfamiliar noise, they revert to survival instincts. In wild areas where noise persists, animals have been known to drop in numbers. According to a 2006 report from the U.S. Fish and Wildlife Service, the Northern spotted owl, an endangered species found in Hoh Rainforest, has been found to neglect feeding its young, or even to eject eggs and juveniles from the nest, when "harassing" noises like passing trucks or electric tools are present.







Hempton at the base of a western hemlock in the Hoh Rainforest. Photo: AP

Though noise pollution isn't quite so life-or-death for humans, research increasingly presents it as a public health risk. "It's not unlike the scientific developments we saw in terms of air or water pollution," says Karen Trevino, chief of the National Park Service's [Natural Sounds and Night Skies Division](#). "The attention has turned to more insidious effects from low-level exposure to noise." The human body still perceives jarring noise as a danger cue, which triggers a stress response—even during sleep, and even in people who have lived in noisy environments for years. When exposed to short, intermittent noises during sleep, study subjects experienced heightened heart rate, blood pressure, and stress hormones. Long-term exposure is even associated with [long-term cardiovascular problems](#).

The solution is simple: [Go outside](#), to the most remote natural spaces you can find. The part of the brain that processes sound is [more attuned](#) to the kinds of amplitude and pitch fluctuations found in nature, so even listening to recordings of natural sounds can [decrease cortisol levels](#), improve memory and focus, and lower blood pressure. As Hempton puts it, "Quiet is quieting."

Earlier this year, scientists with the National Park Service's Natural Sounds and Night Skies Division produced a first-of-its-kind set of ["noise maps"](#) that showed average sound levels around the U.S. It was the result of 1.5 million hours of sound recorded at 600 park sites. High-decibel hotspots on the maps demonstrated what sound scientists have observed for decades: quiet places are dwindling. [As Outside reported](#) when the NPS noise maps first emerged, the researchers who made the maps found one common noise, even in the backcountry: aircraft.

The National Park Service has [several guidelines](#) mandating natural sound preservation, but must work with the Federal Aviation Administration (FAA) and the Department of Defense to [manage airspace above parks](#). The sheer volume of air travel makes carving out no-fly zones a monumental task. According to NOAA, there are more than 87,000 flights over the U.S. daily. Hempton has sent three airlines recordings of their planes flying over OSI, asking them to divert their flight paths from the sky above Hoh Rainforest. "In many cases it saves jet fuel," he says. His efforts were not as successful as he'd hoped. Between 2005 and 2007, all three airlines agreed to divert only their unscheduled flights—the kind that celebrities or wealthy travelers can request for last-minute trips. This is because the average commercial flight typically stick to the FAA's [preferred flight routes](#), which are essentially the traffic lanes of the sky. Defaulting to this does keep air traffic running normally, but much to Hempton's distress, some routes still pass over Olympic National Park.

Noise from military flights above the park is another major concern. [The U.S. Navy has been flying noisy Prowler and Growler planes over the Olympic Peninsula since 1942](#). But a 2014 proposal would increase its electronic warfare training program and would up the number of flights by about 10 percent from the current number of three flights a day, according to the Navy. Residents on the Olympic Peninsula—including [one group](#) created specifically to fight the proposal—[say military jet flybys register above 100 decibels](#). "The noise levels of these operations will cause a noise impact [to wildlife and human health] [that I expect would easily take decades to repair](#)," Hempton says.





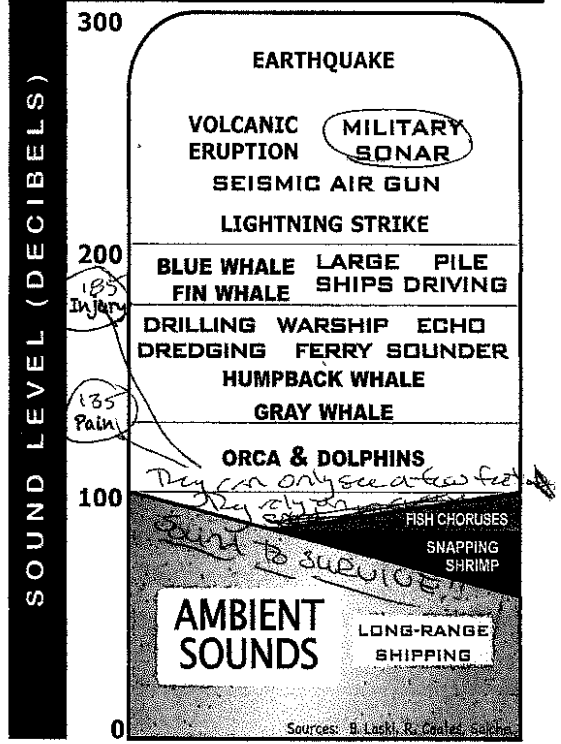
A quiet trail in Olympic National Park. Photo: Gordon Hempton

As U.S. Representative Derek Kilmer (D) wrote in a [public letter](#) in May, the Navy's proposal and environmental assessment lack two key pieces of information: a realistic estimate of the increase in flights over Olympic National Park (the current estimate is an extra 130 flights yearly), and the real-life impact of Growler noise on wildlife and human health. In early June, Hempton received a letter from Kishore Rao, the director of UNESCO's World Heritage Center, requesting the latter as well. Olympic National Park is a World Heritage property, and though UNESCO outlines no explicit protection for the area's soundscape, Rao indicated concerns that the operations would hurt the wildlife and natural resources that brought it to UNESCO's attention in the first place. Navy officials say they will cooperate with the request for more studies, though they haven't given a specific timeline for doing so. A decision on the Navy's proposal has been delayed until 2016 due to these requests as well as a louder-than-usual citizen response.

In the meantime, Hempton is working on his pitch to the parks service for preserving quiet. If OSI became the nucleus of the world's first quiet reserve, Hempton says, "We'd be the Yellowstone of sound ecotourism." If Hempton is successful, OSI would be the first natural area with zero noise pollution, which Hempton says would be a goldmine of information for sound scientists, not to mention a more natural habitat for animals in the area and a more serene experience for visitors.

"I'm optimistic that we can preserve silence, but if it doesn't happen then noise will continue to intrude until we come around," Hempton says. "There's no alternative to quiet. It's one of those things that keeps us sane in life—like clean air, it just takes some smog to remind us why we need it."

# UNDERWATER SOUNDS



HUMAN-INDUCED NOISE HARMS SEA LIFE.

Nordland , WA 98358

February 13, 2017 Jefferson County Commissioners Port Townsend, Washington Dear Commissioners: Thank you for supporting the Marrowstone Environmental Impact Statement request. And also for working with 3 other counties, because we are all part of the same ecosystem... I want to focus on some of the health concerns for humans and other animals. The Growler is the "single loudest aircraft ever manufactured"!!! I will share how this impacts a woman in Coupeville & as I read this, try & visualize how this will impact all living things around us & in the sea. Read : (Excerpts)

ile:///Users/██████████/Documents/Growler%20Jets-Navy%20Warplanes%20-%2020-17.webarchive ██████████ | Sounds of War: Navy Warplanes Producing Deadly Noise Around US Bases Monday, July 27, 2015 By ██████████, Truthout | Report "COER hired an expert to measure noise levels around OLF Coupeville, and Bowman spoke to the results of the study. She explained that people in the area around the Navy's airstrip are regularly exposed to 80 decibels and that at that level, OSHA requires training and hearing protection be worn, as part of a hearing protection program. ██████████ ██████████, a business owner in Coupeville, has recorded 130 decibels When the jets fly over her family's home, "We stop doing whatever we were doing in living our lives, take immediate actions to protect ourselves, close all of the windows, and reach for our noise-reducing head phones." This of course means they can no longer talk to each other or anyone else, and if the flights continue, they are forced to leave their home to escape the damaging jet noise, which of course becomes more challenging at night. ██████████ said that the experience of being exposed to this level of noise produced by the warplanes "is hard to describe." She explained: "It vibrates windows, walls and water in the bathtub. You can feel it vibrating the insides of your body. It is frightening. It feels like you are going to die. The noise really is killing me, slowing and over time. And I am having physical symptoms of this impact, both physically and psychologically." According to ██████████, ██████████ experience of feeling like she is going to die is not unfounded, according to several peer-reviewed medical studies: These levels of noise can, actually, cause death. The cardiovascular system is at risk," he explained. "Noise excites a classic stress response, because historically humans and other mammals are hard-wired to respond to noise as danger. So when loud noise occurs, the stress response causes an increase in blood pressure and heart rate and alertness. It is a basic biological reflex. So if I were to put a blood pressure cuff on you and expose you to those noises, your blood pressure would go up." And if the noises we are exposed to occur abruptly, as when a Growler, the single loudest aircraft ever manufactured, flies near our home, the negative health response ██████████ refers to becomes even more accelerated" ██████████ | Sounds of War: Navy Warplanes Producing Deadly Noise Around US Bases Monday, July 27, 2015 By ██████████, Truthout | Report Now visualize 135 Growler flights 12 hours per day, 5 days a week, leaving from 2 airports on Whidbey Island! Let's follow a flight from OLF Coupeville. It's low flight disturbs the migrating wetland area by the ferry, heads over water, where sound travels faster, & where orcas, dolphins & whales communicate by sound...Will their sonar be jammed? How will it affect crew & passengers on the ferry? It flies near Fort Flagler & Indian Island...both basically quiet nature reserves, onto Port Townsend, our city too, where it affects the residents, tourists & animal life there. The flight continues to the Olympic National Forest, where it will

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.n. Alternatives Considered But Eliminated
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

attack 12 different moving targets with electromagnetic waves!! The irony, is that the quietest square inch in the lower 48 states is in the Hoh Forest in the Olympic National Park! <https://www.outsideonline.com/2000721/welcome-quietest-square-inch-us> And the researcher says the Growler noise impact to wildlife & human health could easily take decades to repair. And where there are no people, Growlers are allowed to go as low as 500 feet & these sounds will intensify off the mountains & the water! The animals will be terrified & will have gone from living in the quietest place, to living in an ongoing war zone! We all will, too. But the animals are defenseless & cannot speak for themselves. Who will speak for them? We all need to speak for them and for all the animals around us... as well as ourselves...thank you. These are the comments I gave to the Jefferson County Commissioners on February 13, 2017. The article about this meeting requesting a Marrowstone Islands EIS is printed in the Port Townsend Leader is in this link: [http://www.ptleader.com/news/marrowstone-residents-groan-over-growlers/article\\_f7feda82-f30c-11e6-a089-27179c45e351.htm](http://www.ptleader.com/news/marrowstone-residents-groan-over-growlers/article_f7feda82-f30c-11e6-a089-27179c45e351.htm) How can we fly the loudest plane ever manufactured over the quietest areas in the lower 48 states????? !!!! Please find another spot for electronic growling warplane practice!!!

February 18, 2017

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS  
 6506 Hampton Blvd.  
 Norfolk, VA 23508

**Re: Draft EIS for EA-18G Growler airfield operations at Naval Air Station (NAS) Whidbey Island**

I am commenting on this draft EIS that would expand existing EA-18G Growler operations at the NAS Whidbey Island by adding 35 or 36 aircraft to support expanded electronic warfare exercises on OLFAC on Whidbey Island and in the San Juans, Puget Sound, Olympic Peninsula, and adjacent areas. While I support the need for adequate military training, I also support a fair and open public process that protects public health and the environment.<sup>1</sup> Unfortunately, the Navy's draft EIS fails to do so as described below:

The Draft EIS Improperly Segments the Navy's Expansion of Growler Activities

The Draft Environmental Impact Statement (EIS) is deficient in not addressing 40 additional Growlers that are in the process of delivery beyond the 35 or 36 identified in the Proposed Action.

The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into multiple separate actions:

1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft;
2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers);
3. 2012 EA (26 Growlers including 5 from a reserve unit);
4. 2014 EA (Growler electronic warfare activity);
5. 2015 EIS discussing electronic warfare training and testing activity;
6. The current 2016-2017 DEIS (36 Growlers);
7. And, a seventh likely process, as confirmed by a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160.

<sup>1</sup> Sierra Club policies require that all public agencies, including the Armed Services and the Department of Defense, "should strive to protect the integrity of human and natural communities (and that) military training and preparedness should be pursued in ways that avoid or minimize adverse effects."

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 18.d. Washington State Greenhouse Gas Goals
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources



As a result, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish to protect human health and the environment. Furthermore, this piecemeal approach to public involvement violates NEPA as 40 C.F.R. § 1502.4 “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.”

In public meetings, the Navy referred to these increases in Growler activities as “adjustments” to its mission, but “adjustments” to functionally and geographically related activities, each of which when taken individually might not rise to the level of “significance,” are significant when taken together. This segmentation represents a significant but hidden erosion of environmental protection and public health. Citizens, elected officials, and tribes have reminded the Navy for years that its segmentation of impacts violates both the law and the public trust, but the Navy continues to ignore these concerns.

#### The Draft EIS Fails to Consider All Impacts

The draft EIS only analyzes potential impacts for 35 or 36 of potentially 160 Growlers, and is further confined to evaluating impacts only to areas immediately surrounding the runways. However, jet noise, emissions and other impacts from Growler operations adversely affect a wide area including Olympic National Park, state parks, tribal and private lands as well as Puget Sound and endangered Orcas and other species.

By failing to enlarge the scope of its analysis beyond Naval Air Station Whidbey Island, the DEIS also violates NEPA by not considering all the interdependent parts of a larger action: Growler operations cannot proceed without takeoffs and landings, regional overflights, broadly distributed noise impacts, etc. By failing to consider these additional impacts, the DEIS also fails to evaluate cumulative effects as required by NEPA.

#### The Draft EIS Fails to Consider All Alternatives

The Navy has not made a good faith effort to explore other alternatives as NEPA requires in S40 CFR 1502.14 (a). All of the Navy’s ‘alternative’ scenarios will increase noise, harm to health, and other adverse impacts. The Navy’s “no action alternative” would continue Growler operations that currently expose people in homes, schools, parks and businesses to noise that exceeds community standards set by the State of Washington, the EPA, the Occupational and Health Administration (OSHA), and the World Health Organization. No genuine “no-action” alternative is proposed that would address these impacts. Furthermore, the draft EIS violates basic NEPA procedures, as it appears to improperly reflect procurement and operational decisions already made by the Navy.

### Increased Air Emissions and Worsening Effects on Climate Change Not Adequately Addressed

Growler jets use an extraordinary amount of fuel--a single Growler jet's emissions dwarf what thousands of citizens seek to reduce voluntarily by choosing to use electric cars, add solar collectors to their homes, and conserve energy in other ways. In its continuing and planned expansion of the Growler fleet, the Navy has ignored the cumulative impact of Growler emissions, including their effects on climate change. The military is the world's largest single user of fossil fuels, and exhaust emissions beyond the narrowly defined affected areas near runways are not being analyzed and should be.

### The Navy Has Failed to Document that DOD-Owned Lands Are Unsuited or Unavailable for Growler Operations

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to examine non-Whidbey Island sites to conduct flight carrier land practice (FCLP). Instead, it continues to assume that an outdated and dangerously small World War II landing strip on Whidbey, the OLFC, can be used for an increasing number of Growler and other training flights.<sup>2</sup>

The two most dangerous aspects of flying are the approach, landing and takeoff. Because the OLFC is about 49,000 acres smaller and 3,000 feet short of the Growler standard for these maneuvers, it places nearby schools, hospitals, residences, a state ferry terminal and parks, and a state conference center at serious risk of accidents. This risk is greatly increased because FLCP maneuvers are, by their nature, conducted at low elevations where collision with birds is likely to occur, particularly since much of the surrounding area is a protected habitat for shore birds.

The draft EIS, itself, acknowledges that one of the runways at OLFC has an "unacceptably steep angle of bank" and can only be used 30 percent of the time due to weather conditions. Yet knowing this, the Navy is significantly increasing the number of flights there and placing nearby communities at harm.

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<sup>2</sup> Unfortunately, this failure represents a continuing pattern and is consistent with the Navy's previous decisions regarding its request for a permit from the USFS to conduct electronic warfare missions on the Olympic Peninsula. In this instance, the Navy never adequately substantiated its need for non-Defense Department lands or that DOD lands were either unavailable or unsuitable, which was the primary requirement of a 1988 DOD-USDA Master Agreement.

### Impact on Threaten Endangered Species Not Adequately Addressed

The Navy needs to provide a more detailed and specific response on whether and how the additional Growlers will affect endangered species, particularly Marbled Murrelets, given that the acknowledged lack of scientific information on noise impacts to this species affects the ability to determine harm and cumulative effects. This is particularly urgent in light of their precipitous decline and the December 2016 decision by the State of Washington to reclassify Marbled Murrelets from threatened to endangered.

More generally, by failing to initiate consultation under Section 7 of the Endangered Species Act with the US Fish and Wildlife Service on the potential impacts from the significant increase in Growler flights, the DEIS fails to evaluate direct, indirect and cumulative impacts on threatened and endangered species.

### Inadequate Consideration of Public Health Impacts

Growler jets utilize the latest electronic warfare capabilities yet the risk of exposure to people and wildlife from downward-directed radiation is not considered. The only discussion we are aware of was a brief mention in a 2014 EA, in reference to radio transmitters on mobile emitter trucks and the stationary transmitter at Pacific Beach on the Olympic Peninsula. In that document, the Navy referenced a paper and concluded that links from radiation exposure to leukemia were speculative, when in fact, that same paper stated unequivocally that there are direct links between radiation exposure and childhood leukemia. Despite this, any mention or discussion of risks from exposure to electromagnetic radiation from Navy jets is completely missing from all discussions of potential impacts.

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading for two reasons: (1) the Navy inappropriately uses a 365-day averaging rather than busy-day averaging, and (2) the Navy represents as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. Furthermore, modeled noise levels by the Navy have not been validated with on-site noise data nor has the Navy made any actual noise measurements in the affected communities. In addition, the NOISEMAP software used for computer modeling is outdated, and a report from a DOD commission concluded that noise measurements using this software may be legally indefensible.<sup>3</sup> Additionally, the DEIS selectively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research.

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<sup>3</sup> <https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>

Sincerely,

[Redacted signature block]

[Redacted line]

[Redacted line]

Port Angeles WA 98362

Oak Harbor, WA 98277

As an instructor pilot and LSO at VAQ-129, it appears that the only reasonable course of action is an 80/20 split, with 80% of FCLP's conducted at Coupeville. Any other proposed split would further congest an already overused landing pattern at Ault Field and would be not only detrimental to the training of young Growler pilots, but to all NAS Whidbey-based aviators. Increasing operations at Ault Field would also present safety concerns with more aircraft operating in the same airspace and would require significant training among the tower and approach controllers who often can barely manage the current level of traffic.

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

5.b. Overtasking/Overloading of Air Traffic Control at Ault Field and Elsewhere

Dear Navy and USFS:

December 5, 2015

First of all, as a geo-scientist, business owner and citizen of the Peninsula for more than 30 years, I vehemently **OPPOSE** the Navy's proposal and "alternatives" to continue Growler operations over populated and environmentally sensitive areas of the Olympic Peninsula and Salish Sea. This is due to multiple negative effects of Growler NOISE on families, communities, businesses and wildlife. Here are our reasons why:

1. **The Navy's actions have illegally violated our democratic principles.** Unlawful actions committed by the Navy and the USFS have forced Growlers over our communities which has been in complete violation of the National Environmental Policy Act (NEPA) and the National Forest Management Act, multiple times. Your current plans and alternatives should be immediately disqualified due to these violations, including intentionally segmenting the process, non-disclosure of the truth, improper studies and notifications, and a completely, fractured process making it extremely difficult for the little informed public to follow! Shame on you.
2. **Any increase in Growler NOISE is too much!** We already experience devastating health effects in our homes, our parks, our businesses, our communities and in Olympic National Park. We are devastated by the current NOISE and feel it as an assault on our daily lives. Our mental health and quality of life is destroyed by Growler NOISE and the current Growler operations need to cease immediately!
3. **The Navy has intentionally LIED about the NOISE levels** and been dishonest in it's reporting and in it's false conclusions. The Navy did not take a single real-time measurement of noise experienced by communities. You cannot measure jet noise by computer modeling and taking the average of Growler NOISE with the quiet measured in the area. We are a quiet part of the World, which only skews the false data even farther! The NOISE impacts of the Growlers has been lied about to the public to promote your mission without accounting for the negatively disruptive impact on many, many people' s health, livelihood and lives.
4. **The current Growler NOISE is disruptive and harmful to our health.** As hard-working, citizens, we work hard to be legal, fair and just; to have a chance to live in peace. Growler NOISE has decimated our ability to achieve any peace of mind when outdoors, and our ability to restore from hard working and stressful lives. This is completely unfair and unjust! We depend on the natural environment to restore our mental, physical, and spiritual health. The Growlers destroy ALL of that peace! We can no longer go outside, garden, enjoy a walk, hear the birds, listen to the waves - all due to loud Growlers NOISE! and their harmful effects.
5. **All of the Navy's 'alternative' scenarios are UNACCEPTABLE and will increase noise, harm health and other very adverse impacts.** The Navy's "no action alternative" would continue Growler operations that currently expose people in homes, schools, parks and businesses to noise that exceeds community standards

- 1.a. Thank You
- 1.d. General Project Concerns
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 12.c. Socioeconomic Impacts
- 12.n. Quality of Life
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area

set by the State of Washington, the EPA, the Occupational and Health Administration (OSHA), and the World Health Organization.

6. **We deserve to live in peace and not a simulated war zone.** Many people live and work in PT, on the Olympic Peninsula, and Puget Sound Region. The Growler NOISE destructively impacts all outdoor operations, maritime businesses, tourist businesses, outdoor education, sport fishing, recreational businesses, health-oriented business, restaurant and lodging. It IS already disruptive and destroying a network of families, communities, and citizens simply trying to live a normal life! We have only barely recovered from the Great Recession and cannot sustain our way of lives and our businesses with the current or any additional Growler Noise which negatively impacts our entire environment. How can you justify destroying entire communities for your games?
7. **We do not deserve to suffer from Growler PTSD.** The Growler's NOISE drives friends, visitors, tourists and many citizens away from our homes and this is devastating businesses, families and communities in their EXTREMELY LOUD wake! The Growlers need to GO AWAY.
8. **Flying NOISY Growlers over Olympic National Park is a travesty.** This World Heritage Site, World Biosphere Reserve and last temperate rainforest in the world is home to many endangered species, including the marbled murrelet, the spotted owl, the white pelican, many salmon, the resident orcas and many critical, threatened and endangered species hanging onto a thread of life. This should be BROADCAST LOUDLY AROUND THE WORLD that a Navy war game is proposed that impacts everyone in the entire Puget Sound Region and visitors from all around World.
9. **There are far more appropriate locations the Navy can, and should, consider** that wouldn't disrupt so many humans, homes, families and communities and wildlife.
10. **WE DEMAND A FAIR PUBLIC PROCESS, INCLUDING A FULL, COMPLETE AND COMPREHENSIVE EIS (ENVIRONMENTAL IMPACT STATEMENT)!**

I and my family vehemently oppose the Navy's operation of the Growlers! Our health, our homes, our lives are at stake.

[REDACTED]

[REDACTED] AND FAMILY

*Scientists*

*Manufacturers*

*Musicians*

Port Townsend, WA 98368

I object to the Navy's increase of Growler noise and traffic over the Olympic Peninsula! These missions are highly disruptive to the people and businesses that live on the Olympic Peninsula and in Port Townsend. The Navy's plans will negatively impact a recovering economy for this region and has either completely ignored or dramatically downplayed the noise and impacts these extremely loud Growlers have on the citizens of the area. Please put a muffler on the Growlers and fly your mission in other less populated regions of the State only 15 minutes away! You have not held any public meetings in Port Angeles, one of the most highly effected areas. You scheduled meetings ust before Christmas in just five tiny, remote towns (except Oak Harbor where you receive the most support!). You have not notified the mainland public of the Greater Seattle area about your plans, at all. You are cowards. A large portion of the entire metropolitan Seattle area that comes to recreate, stay and support the business and tourist communities of Port Townsend and the Olympic Peninsula have been completely left out of all of your notifications. You know this will affect many thousands of people and you are afraid of their response. Notify all citizens of the metropolitan area that live and support the Olympic Peninsula properly and then prepare to deal with the response. You can mitigate your Growler noise by flying in less populated areas. Growler noise is destructive to human health, economic sustainability, endangered species and our quality of life. Why should you be able to conduct what you want at the cost of our peace? You are planning to destroy citizens peace of mind and a way of life, not protect it. Please fly your extremely noisy Growlers in less populated areas, like eastern Washington where far less people will be impacted negatively by your loud Growlers.

1.a. Thank You  
10.f. Endangered Species Impact Analysis Adequacy  
12.c. Socioeconomic Impacts  
12.f. Economic Hardship and Impacts  
12.h. Tourism  
12.n. Quality of Life  
2.e. Public Involvement Process  
2.n. Alternatives Considered But Eliminated  
4.r. Nonauditory Health Effects  
4.t. Noise Mitigation



Port Townsend, WA 98368

I object to the Navy's increase of Growler noise and traffic over the Olympic Peninsula! These missions are highly disruptive to the people and businesses that live on the Olympic Peninsula and in Port Townsend. The Navy's plans will negatively impact a recovering economy for this region and has either completely ignored or dramatically downplayed the noise and impacts these extremely loud Growlers have on the citizens of the area. Please put a muffler on the Growlers and fly your mission in other less populated regions of the State only 15 minutes away! You have not held any public meetings in Port Angeles, one of the most highly effected areas. You scheduled meetings ust before Christmas in just five tiny, remote towns (except Oak Harbor where you receive the most support!). You have not notified the mainland public of the Greater Seattle area about your plans, at all. You are cowards. A large portion of the entire metropolitan Seattle area that comes to recreate, stay and support the business and tourist communities of Port Townsend and the Olympic Peninsula have been completely left out of all of your notifications. You know this will affect many thousands of people and you are afraid of their response. Notify all citizens of the metropolitan area that live and support the Olympic Peninsula properly and then prepare to deal with the response. You can mitigate your Growler noise by flying in less populated areas. Growler noise is destructive to human health, economic sustainability, endangered species and our quality of life. Why should you be able to conduct what you want at the cost of our peace? You are planning to destroy citizens peace of mind and a way of life, not protect it. Please fly your extremely noisy Growlers in less populated areas, like eastern Washington where far less people will be impacted negatively by your loud Growlers.

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2.e. Public Involvement Process  
2.n. Alternatives Considered But Eliminated  
4.r. Nonauditory Health Effects  
4.t. Noise Mitigation

Port Townsend, WA 98368

The Navy Growler expansion over the populated areas of Port Townsend and the Olympic Peninsula is a tragedy for the people of the State. The Navy has been evasive and very sneaky and tactical in their minimal notification of place after the devastating Presidential Election and just before Christmas in small towns for ensuring the most minimal opposition from the people. Most people are completely unaware of the Navy's plan! Your timing couldn't be more advantageous to ramming your plans through without much input. The Olympic Peninsula and communities like Port Townsend and Port Angeles depend on tourism and the steady support from the Mainland Seattle area visitors. NONE of them have been notified. Our communities are hanging on by a thread, still, since the recession. Businesses close every month, still. Now, with your deafeningly loud Growlers in the works, your plans will destroy our economy, our businesses, our communities and our homes with destructive sound! Why don't you fly your Growlers over the less populated area of the State like Eastern Washington. It is just 10-15 minutes flight away and you will impact far less people! Growlers need to be grounded on weekends, too, when citizens are recreating outside or trying to recover from stressful work weeks. Your Growlers have been heard and they are the most destructive to any peace to anyone outside, and inside, too. You claim to be protecting citizens? We believe you will be destroying our way of life, our homes, our families and our communities. Just so a chosen few can have jobs ~ our peace of mind and way of lives are sacrificed? Fly elsewhere for your mission and DO NOT destroy the communities of the Olympic Peninsula, Whidbey Island, Port Townsend, Port Angeles and all the other peaceful communities in between. Seattle citizens have no idea what they are about to lose, as well. We beg you to FLY ELSEWHERE!

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.n. Quality of Life
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.e. Public Involvement Process
- 2.n. Alternatives Considered But Eliminated
- 4.t. Noise Mitigation

1.a. Thank You

Anacortes, WA 98221

We have listened to the Navy jets fly over Anacortes for the last 50+ years. Love the 'Sound of Freedom!' Have no problem with the noise. Go Navy and thank you to the young men and women that serve.

Anacortes, WA 98221

Growler EIS: UNMITIGATED NOISE POLLUTION AFFECTS MY QUALITY OF LIFE! As a resident of Anacortes, the noise of frequent low flying jets has already posed NOISE pollution enough to cause hearing damage. These jets fly low over my roof and usually well into the night hours including past midnight! I can feel the vibration when they fly overhead. No conversation can be had because of the horrendous noise. It is terrible enough the complaint line is on my speed dial! The LAST time a HUMAN picked up the phone was probably in 2012 when the officer in charge berated me for not checking the layout of the runways before buying my house!!!! These complaints are NOT reviewed real-time and therefore no remedial action are taken at the time. Almost useless, won't you say?! As a taxpayer I object to the civilian abuse and disrespect the Navy has shown. These jets affect MY quality of life and health. I object to additional Growlers at Whidbey Island unless the Navy truly and effectively WILL mitigate the air and noise pollution over the Skyline area of Anacortes in SKAGIT COUNTY. I resent that you all forget and neglect EIS on SKAGIT COUNTY. We are affected just like, if not more than Island or San Juan counties. Further, since these Growlers are not built in WA state it is more LUDICROUS that we should suffer from its damaging NOISE pollution without much economic benefit. Thank you.

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.n. Quality of Life
- 3.a. Aircraft Operations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 6.b. National Ambient Air Quality Standards Compliance

Ardmore, PA 19003-1728

1.a. Thank You

10.a. Biological Resources Study Area

In my opinion, the Naval Air station plans to use far too many growler jets to fly over the Olympic Nat'l pk Wilderness areas are precious and also fragile. Migrations, nesting, safe habitats must be preserved.

Anacortes, WA 98221

1. The increased number of flights over my home in Anacortes will add increased days of unacceptable noise levels that will lessen the value of real estate in the area. Solution - route the flight patterns further out to sea where there are no homes. 2. Your studies show "no impact" to individuals affected by the noise. I disagree with this conclusion. It impacts my life significantly. 3. I agree defense of our country is important. However, there must be better locations for the training of pilots that greatly reduce noise levels to residential communities. Please explore them before adding to the frequency of flights over Anacortes, WA. 4. Thank you for the opportunity to voice my concerns.

1.a. Thank You  
12.j. Property Values  
2.n. Alternatives Considered But Eliminated  
3.a. Aircraft Operations  
4.t. Noise Mitigation



# Public Meeting Comment Form

Thank you for attending the public meeting on the Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) Provide written comments at today's public meeting; (2) Speak with the stenographer, who will record your comments; (3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com); or (4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 18.a. Climate Change and Greenhouse Gases
- 18.b. Average Carbon Dioxide per Aircraft
- 2.e. Public Involvement Process
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

1. Name [REDACTED]

2. Organization/Affiliation Lopez resident since 1975

3. Address [REDACTED]

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

I am concerned to see local endangered marine species on your list of those who might be effected by more growlers. These species are already overimpacted by human activity. It seems cruel to add more.

Have you observed the startle effects in the bird population as the growlers fly over Lopez?

What is the total CO2 output per Growler annually

Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

our figures show 12.5 metric tons of CO<sub>2</sub>/hour.  
Increasing the number of growlers would  
increase our carbon footprint. It is time that  
we have to keep climate change in mind.  
Adding growlers would add to the factors  
that cause climate change.

Public Involvement:

Lopez wants to meet with Navy decision makers  
so they can hear our concerns directly. The  
Navy is causing significant impact to us  
with the wall of low frequency noise and  
we need them to hear about this from us,  
better yet we need the Navy decision makers  
to experience what it is like to live under  
a firing growler. When will you arrange  
a meeting?

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print  
Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**



Noise ~~Address~~ *finish*



## Public Meeting Comment Form

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1. Name [REDACTED]
2. Organization/Affiliation *Lopez citizen since 1975*
3. Address [REDACTED]
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

*There has been plane noise since I moved here. The growlers are of a totally different intensity. I can deal with it except when they turn over my house. The noise impact there means I can't hear the person next to me and my finities is so badly effected that I try to flee ~ but even in my house I am subject to intense noise and vibration. This is so stressful, I feel like my home is being violated. The thought of more growlers makes me very upset.*

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.r. Nonauditory Health Effects

Whidbey Island Airfield Op



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Aircraft Operations at Naval Air Station Whidbey Island Complex.*

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1. Name [REDACTED]

2. Organization/Affiliation Lopez resident since 1975

3. Address [REDACTED]

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

We need you to identify the flight paths you take over Lopez. What are the published altitudes Growlers are required to fly over Lopez, what are the power settings for their flights over Lopez. Please limit nighttime flights over Lopez.

Please print • Additional room is provided on back  
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 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 3.a. Aircraft Operations
- 3.f. Field Carrier Landing Practice Operation Totals

Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

Open House Comments

Fill in and Submit at the Open House

- 1. Name [Redacted]
- 2. Organization/Affiliation Lopez Resident since 1975
- 3. Address [Redacted] Lopez Island wa 98261
- 4. E-mail [Redacted]
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like your name/address kept private
- 7. Please check here  if you would like to receive a CD of the Final EIS

- 1.a. Thank You
- 2.a. Purpose and Need
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

- 1. Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).
- 2. Recognize the impacts of low frequency Growler noise on health.
- 3. Incorporate San Juan County noise reports in the EIS analysis.
- 4. Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.
- 5. Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.
- 6. Commit to Mitigation Measures and timelines in the Record of Decision.
- 7. Add your own comments here:

8. I object to the fact that in an important phone call I cannot hear what is being said as a growler flies over. I can't hear the <sup>standings next to</sup> person ~~talk~~.

(Continue on the back)

if any other ~~night~~ person made this kind of noise I could call 911 and have them stopped. why are you allowing yourselves to make such an impact on our lives despite our continued protests

especially  
when I feel  
over my self

9. As a person with tinnitus I am <sup>especially</sup> adversely affected by growler noise. I hunch my shoulders, cover my ears, and run to try to find a place with less noise impact.
10. The noise as a growler turns over your home is of a different quality and intensity than other growler flights. My family has a home in Anacortes and the growler flights there do not bother me to the level mentioned above in #9.
11. As a world citizen I am angered that people, especially children, in a zone already disrupted by war, would be subject to such frightening noise. It is wrong! It is immoral. The US needs to do better than this.
12. The growler impact already faced by myself and my neighbors is too much. It is not right to add more growlers to what is already unacceptable.



Noise Study



# Public Meeting Comment Form

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1. Name [REDACTED]

2. Organization/Affiliation *Long resident since 1975*

3. Address [REDACTED]

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

*The EIS ~~study~~ compares flight activity to the 70's, 80's and 90's suggesting there is no additional impact. As someone who has lived here since 1975 I can tell you that there is a qualitative difference in the noise. I never complained before the growlers. They have made my life at times intolerable.*

*Why does section 3.2 not mention the low-*

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**YOUR INPUT MATTERS**

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.k. Comparison of the Prowler to the Growler
- 4.r. Nonauditory Health Effects

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frequency growler noise? why isn't this information evaluated for health effects

my house vibrates - you I vibrate when the planes turn over my house, you need to study the effect of this.

why hasn't the Navy taken actual noise measurements on Lopez. to see if your models are true

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

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**YOUR INPUT MATTERS**



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1. Name

[REDACTED]

2. Organization/Affiliation

Lopez resident since 1975

3. Address

[REDACTED]

4. E-mail

[REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

My life is already adversely effected by growlers. I feel a loss of control, I feel unheard by the Navy. I have tinnitus, the growlers often turn over my house, and I find myself running to try to find quiet. Now we want to add more. NO. Please either modify your planes to make them less impacted to the people below or fly them where there are no humans below.

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**YOUR INPUT MATTERS**

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.r. Nonauditory Health Effects



## Public Meeting Comment Form

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1. Name

[Redacted]

2. Organization/Affiliation

Loper resident since 1975

3. Address

[Redacted]

4. E-mail

[Redacted]

5. Please check here

if you would NOT like to be on the mailing list

6. Please check here

if you would like to receive a CD of the Final EIS when available

Alternatives: I saw the alternatives at your booth. They did not address the level of noise we currently experience when will a Hush House be built to reduce engine noise? When will jet blast deflectors be installed to send engine run-up noise upward instead of down onto me?

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**YOUR INPUT MATTERS**



Health

stress



# Public Meeting Comment Form

- 1.a. Thank You
- 12.n. Quality of Life
- 4.r. Nonauditory Health Effects

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1. Name [REDACTED]

2. Organization/Affiliation Lopez resident since 1975

3. Address [REDACTED]

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

*I have tinnitus. I live where growlers often turn which means more intense noise for longer than other growler noise. This causes a great deal of discomfort and stress for me. I live in an orchard. My work is pruning tall trees and picking apples from them. When a growler appears out of nowhere the startle effect from my tinnitus causes me to jump. This is dangerous when I am up in the trees. I can't imagine*

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how I will deal with the stress and the  
frustration from increased growler presence.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

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Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

tourism



# Public Meeting Comment Form

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1. Name [REDACTED]

2. Organization/Affiliation *Lopez Resident since 1975*

3. Address [REDACTED]

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

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*People visiting are, startled and upset by the growler noise. It makes Lopez lose value as a tourist location. When my family went to Honolulu last Christmas we chose not to be in an area where there was aircraft noise. This could happen to Lopez. Many people here depend on tourism. It's loss could have big economic results.*

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**YOUR INPUT MATTERS**

1.a. Thank You  
12.h. Tourism

Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name [Redacted]  
2. Last Name [Redacted]  
3. Organization/Affiliation Lopez resident since 1975  
4. City, State, ZIP Lopez Isl Wa 98261  
5. E-mail [Redacted]

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.h. San Juan Islands National Monument

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**



7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

I am subject to startle reflex. My job is to prune tall trees. When growlers come out of nowhere, with their sounds so intense that I have to grab for my ears and hunch over, my situation becomes very dangerous. Will the Navy be paying for injuries or loss of life for me?

13. We deserve another type of hearing with the Navy, one where we can ask questions in a group and hear answers as a group. The current hearings are very stressful. My friend's faces showed that stress and I could not remember, talking to the animal person, what kind of fishing I have done though this has been a big part of my life →

- 13 (cont) and I have never forgotten my fishery types before.
14. Seeing the reactions of young children to the Growler noise I object to young children in war areas being subjected to this ~~was~~ extremely frightening noise. As an American citizen I object.
15. My property values are going down. New people are backing out of land purchases on the south end of Lopez, once they are subjected to this noise. Who is going to compensate us for this?
16. It is time consuming and interrupting to have to continually ~~interrupt~~<sup>stop</sup> my work to call or email about the Growler's being too intense.
17. I live under where the Growler's turn so the noise is even more intense. At the meeting it was suggested to me that I ask you to ask the pilots to not put down their landing gear until they have cleared Lopez.

Thank you, I hope you can help us.



18. Please put someone on the ground here on Lopez with sound measuring devices

Freeland, WA 98249

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

The jet noise is terrifying to people and wildlife here; the possibility of contamination to our fragile aquifer is very disturbing; and the prospect of a large increase of transient military population who have no long-term stake in our pristine rural environment is highly disturbing.



Port Townsend, WA 98368

All growler jets on Whidbey Island, in the Puget Sound, and over the Olympic Mountains are severely negatively impacting my life and my family's lives for years. An increase in these jets will be an increase in the already negative impact. The Puget Sound and the Olympic Peninsula are a completely inappropriate place to run Growler jets and practice warfare. This is a pristine place of multiple national and state parks some of which are on the Historical Registry and others National Heritage Sites. These places are destinations for hundreds of thousands of visitors from all over the world every year -- seeking peace, beauty, and respite from noise and machines. Their coming is essential to our economy and to their health. I live in Port Townsend and work as a Registered Nurse in community health. I am one of many, many residents and homeowners being severely negatively impacted by Growler jet operations out of Whidbey Island. Here are SOME of the ways these jet flights are ruining our lives: 1) Economically 2) Ruination of Peace 3) Health and Safety -- growing DEPRESSION of our adults and children. 4) Pollution of our home environment and our parks -- some of which are on the Historical Registry, and others listed as National Heritage Areas and should be protected. 5) Poisoning of our air, land, and water. 6) Waste and Misuse of important resources. 1) Economic Harms: Our property value here in Port Townsend has shrunk due to the inundation of Growler jet noise in our skies. We are senior citizens on a limited income. The loss of value of our home seriously hurts us and our ability to support ourselves in our older age. We have been contemplating selling our home due to the ruination of our peace because of the Growler noise, but we must issue a disclosure to prospective buyers and accept a price 1/3 lower than we paid for our home 10 years ago. Not to mention shelling out \$20,000 to move. Will the Navy reimburse us for that loss? Right now, with the devaluation of our home and the moving expenses, we figure the Navy already owes us \$100,000. The loss will be even greater with more Growlers! 2) Ruination of the Peace: When growlers go over, the noise blasts through our lives. It is insanely loud, destructive, ripping, and violent. This noise shatters our peace, shreds our peace of mind, scuttles any joy we might be feeling, stops us from speaking to each other, stops us from ANYTHING we are doing or feeling. It is ABSOLUTELY INVASIVE AND DESTRUCTIVE. Another economic harm: When I am composing exacting nursing reports and a Growler jet goes over my house, I must begin from scratch as the horrific noise blasts all thought from my mind. This is amounting to a significant negative impact on my finances and economics. Is the Navy going to reimburse me for my work time lost? Another Economic Harm: Loss of tourism as the peace of the entire area is lost and the beauty impaired by the jets. 3) Health and Safety Impacts: With the destruction of our peace and lives comes a GROWING DEPRESSION. Growler jets bring immediate thoughts of WAR. We are continually reminded of the nearness of WAR. The children tell me they feel frightened and don't like these jets. At night we are all awoken over and over again -- never achieving that deep sleep that is restorative and necessary for good health. THIS CONSTITUTES A "TAKE" OF OUR HEALTH. 4)&5) Pollution of our homes and our parks: Several times in the last year I have been standing in my garden when a Growler has gone over flying low, and dumped fuel on me and my garden. A thick, oily substance, smelling strongly of toxic fuel enveloped me and the garden, making it difficult for me to breathe! The Olympic Peninsula is one of the last remaining pristine areas in

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 18.b. Average Carbon Dioxide per Aircraft
- 18.d. Washington State Greenhouse Gas Goals
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.n. Alternatives Considered But Eliminated
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.f. Fuel Dumping

the United States, and we, as conscious citizens and residents are trying to save and restore our remaining wildlife -- plant and animal. Growler jets are killing that with their pollution -- noise and fuel. 6) The waste of fossil fuel on powering Growler jets is outrageous in a time when our schools are suffering from lack of money to run properly, and our infrastructure is dangerously deteriorating. This waste in a time when the burning of this fuel is bringing on the demise of our planet is STUPID. The above negative effects of Growler jets on our lives represent A HUGE "TAKE." THIS "TAKE" IS A TAKE OF OUR HEALTH, PEACE, ECONOMICS, ENVIRONMENT, WILDLIFE AND ULTIMATELY OUR FUTURES! THE NAVY HAS NO RIGHT TO "TAKE" THIS MUCH FROM US. We want ALL GROWLER JETS REMOVED FROM PUGET SOUND AND THE OLYMPIC PENINSULA. WE HAVE A RIGHT TO HAVE OUR PEACE, HEALTH AND ECONOMICS RESTORED. WE DEMAND THAT THIS PENINSULA NOT BE SACRIFICED FOR WARPLANES THAT SHOULD NEVER HAVE BEEN BUILT IN THE FIRST PLACE! ALTERNATIVE #1 SHOULD BE THIS: THE DISMANTLING OF THE GROWLER JETS AND THE RECYCLING OF THEIR MATERIAL. THE SUBSEQUENT SELLING OF THE RECYCLED MATERIAL SHOULD BE GIVEN TO OUR SCHOOLS. Sincerely, [REDACTED], RN

Port Townsend, WA 98368

THIS IS A REQUEST TO PLEASE EXTEND THE DEADLINE FOR COMMENTS ON THIS IMPORTANT ISSUE FOR A FULL 45 DAYS BEYOND THE JAN. 25TH DEADLINE. AS YOU WELL KNOW, WE ARE ALL EMBROILED WITH END OF THE YEAR ACTIVITIES, OBLIGATIONS, AND WORK AND NEED THIS EXTRA TIME TO COMMENT INTELLIGENTLY ON THIS EXTREMELY IMPORTANT SUBJECT. THANK YOU. SINCERELY, [REDACTED]

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Port Townsend, WA 98368

To My Navy Neighbors, I live in Port Townsend and work as a Registered Nurse in the field of community health. I am one of a number of local residents and homeowners being severely negatively impacted by the Growler operations on Whidbey Island, and around the Olympic Peninsula. My family and I moved here 10 years ago for the peace and retreat atmosphere of the Olympic Peninsula. Growler jet noise is now invading and denigrating every aspect of our lives. \* Broken concentration while writing important nursing reports on the computer or researching health topics for my clients. \* Shattering of the peace of our environment and our home while working outside in the garden. Dumpings of jet fuel -- poisoning the air as I garden -- forcing me to cover my mouth and nose in order to breathe. \* Multiple forced awakenings at night for hours on end, until I try to KEEP myself awake so as NOT to be awakened again by the shock of the sound of WAR, embodied in the assaultive, shattering roar of the Growler Jets, pounding down upon our heads for hours on end. \* Symptoms of depression, sleeplessness, and hopelessness engendered by the repetitive, oppressive noise of the Growlers -- erasing every thought, interrupting every experience, deadening every hope we have -- that our species, including our grandchildren, might have a future on this planet. \* Despair at the realization that the value of our home -- our most important financial asset -- which we are depending on to provide for us in our coming old age -- that value has been HALVED by the negative environmental impact of Growler operations on Whidbey Island and the Olympic Peninsula. Now, should we need or want to sell our home, we will need to DISCLOSE to potential buyers the ugly truth that the environment here is NO LONGER SERENE -- it is an environment sacrificed to the practice of WAR. \* The "taking" of my right and ability to visit our state and national parks (Fort Flagler, Fort Casey, and the Olympic National Park) in order to experience the rejuvenating effect of untrammelled nature. This type of experience has become impossible for us. Growler jet operations over our parks destroy any possibility of communion with nature and the revitalizing effect that has always had for us. OUR FAMILY HAS STOPPED GOING TO OUR PARKS! AVOIDING OUR PARKS -- AND THE POSSIBILITY OF GROWLER JET OPERATIONS -- IS LESS DESTRUCTIVE TO OUR SPIRITS THAN VISITING OUR PARKS AND EXPERIENCING THE DESTRUCTION OF NATURE'S PEACE. Another ironic thing is this: Our parks were established to preserve people's ability to experience the healing quality of the wild. In it's misguided but probably good intention to "save" our county from foreign invasion, THE NAVY IS DESTROYING THE VERY QUALITIES OF LIFE IT IS MANDATED TO PROTECT!!! PEACE!!! THE RIGHT TO LIFE, LIBERTY, AND THE PURSUIT OF HAPPINESS!!! If our goal is truly to defend our beloved country, let us apply the most effective methods to attain that goal. If our goal is to preserve the peace and safety of our citizens, then let us do EVERYTHING WE CAN POSSIBLY DO TO ATTAIN THAT GOAL. The ability to defend ourselves from attack is essential. Thanks to the Navy for its part in that! But Peace and Safety are not attained through defense alone. We must employ EVERY AVENUE to achieve Peace on Earth -- the Peace that will ensure our descendants may prosper -- retaining the ability to enjoy, as have we, the astounding beauty and plenty of this incredible planet, and for endless generations to come! AS A NATION, WE MUST STUDY PEACE, AS WELL AS WAR. THE STUDY OF PEACE IS AN IMPORTANT PART OF A VIABLE DEFENSE STRATEGY. IN ORDER TO

- 1.a. Thank You
- 1.d. General Project Concerns
- 12.j. Property Values
- 2.a. Purpose and Need
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 6.f. Fuel Dumping

MAKE OUR WORLD, OUR COUNTRY, OUR COMMUNITY A SAFE PLACE, WE MUST TAKE UP THE STUDY OF PEACE! THE STUDY OF PEACE WILL BE ONE OF OUR MOST IMPORTANT DEFENSE STRATEGIES. ANYTHING THAT BRINGS ILLNESS, DISEASE, PAIN AND DISTRESS TO THE AMERICAN PEOPLE IS NOT PART OF A VIABLE DEFENSE STRATEGY. IT IS A MEANS THAT, FAR FROM JUSTIFYING THE END -- A SAFE, PEACEFUL LIFE AND WORLD -- RENDERS THAT GOAL IMPOSSIBLE. I beg you: Please do not continue destroying the quality of U.S. citizens' lives in the pursuit of the practice of war. Together, let us find a solution for the glut of Growler Jets that our congress people are foisting upon us! Sincerely, [REDACTED], RN  
Port Townsend, WA [REDACTED]

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

Victoria, British Columbia V8X 4G3

We're curious about a couple of points but first....yes, we hear the growlers and feel the vibration here in Victoria BC. We feel for those who live close by your operation. Is there no modern, electronic way to make accurate projections with less flights? Are non renewable fossil fuels actually renewable after all? Your flights must make a sizeable dent in in our fossil fuel reserves. Thanks for taking the time to read our heartfelt comments. Kind regards, [REDACTED]

1.a. Thank You  
12.n. Quality of Life

Port Townsend, WA 98368

Growler jets already cause noise pollution which is unbearable and damage our quality of living. We are the people you are meant to protect, but you are actually attacking us.

**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_  
*citizen (retired teacher)*

3. Address \_\_\_\_\_  
*Coupeville, Wa. 98237*

4. Email \_\_\_\_\_  
*Home owner in Coupeville*

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

My field has been in child development and environment play such an important role in their growing up - We need Sature leaders who can hear!

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

Victoria , British Columbia V8T 4M2

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.i. Proposed Action

I am looking for some comment about the EA-18G "Growler" jets at Whidby Island. Are their numbers expanding? Does this mean more noise? Why not hold public info sessions in Victoria in addition to Wash. State communities?

1.a. Thank You

Pensacola, FL 32507

The Navy has been training there for as long as most can remember. Before the houses were built, before the Navy helped shape the island into what it is today. The 10 years i lived there i nevr once complained because i knew it was a small price to pay for freedom. Jets over whidbey and the OLF are a tourist attraction as big as Deception Pass or any of the other wonderful sites on the island.

**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/ISS*

1. **Name** \_\_\_\_\_

2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military) \_\_\_\_\_

3. **Address** \_\_\_\_\_ *Coupeville, WA 98239*

4. **Email** \_\_\_\_\_

Top of Form  
Bottom of Form

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 10.b. Biological Resources Impacts
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.d. Arrivals and Departures
- 4.m. Supplemental Metrics
  - o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.b. Overtasking/Overloading of Air Traffic Control at Ault Field and Elsewhere

*Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.*

**Comments**

**Please check all that concern you and add additional comments on the back.**

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- *Health effects from noise and low-frequency sound.*
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.

- A decrease in private property values due to noise.
- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

1.a. Thank You

oak harbor, WA 98277

I live under the flight path in oak harbor. The jets are noisy but it's over in a few seconds. My animals and the deer that visit me do not pay any attention to the planes at all. The planes alter their approach so the sometimes run N. Or S. Of us. These fields are very important to our pilots. I feel that a little " Freedom Thunder" is a small price to pay.

Anacortes, WA 98221

I have witnessed a dramatic increase in both the number and decibels of jet action since the Growlers came to our skies. I live in Skyline and hike all over Fidalgo Island, and there have been many times I have had to plug my ears (even inside my own home) due to ear pain. It also feels like living in a militarized zone which does not make me feel safe or free. Unfortunately, the Trump administration has evidently frozen access to government scientific documents, so I will have to source Wikipedia rather than the actual NPS document I hope you have read. I include it below and hope you are able to lessen the many impacts of this expansion. I sincerely thank you for your service and attention. The National Park Service which oversees Ebey's Reserve measured actual aircraft noise within the Reserve boundaries over a one-month period in 2015 and determined that the park has the highest man-made noise of any national park in the contiguous 48 states.[30][31] The noise measurements observed exceed the Navy's simulated noise estimates used in the EIS by 20–30 dB, which is a factor 10 to 100 on a logarithmic scale.[citation needed]

1.a. Thank You  
12.n. Quality of Life  
4.j. Other Reports  
4.r. Nonauditory Health Effects

1.a. Thank You

Seattle, WA 98136

Please do not move forward with this plan to militarize these lands.



Freeland, WA 98249

- 1.a. Thank You
- 1.d. General Project Concerns
- 2.a. Purpose and Need

I am a Whidbey Island resident and I am opposed to the huge increase in the number of growler drills projected to be taking place on Whidbey Island. Noise pollution, water pollution, and decreased home values will impact many people including children in school and patients in our hospital. I would beg you to consider the lives you will be harming and the danger to the environment you will be condoning. Currently 6,100 drills to become 35,000 drills -surely there is some room for a compromise. Your reconsideration would be appreciated and applauded. Sincerely, [REDACTED]

Freeland, WA 98249

1.a. Thank You  
4.l. Points of Interest  
4.t. Noise Mitigation

With all respect I wish to make note that the sound level of the jets reaches into the Beverly Beach area when they are practicing at the Outlying Field in Coupeville, WA. It is loud here so I can't imagine what directly under the practice area is like. I respectfully request that reconsideration be given to reduce the increased number of flights and I don't care what it costs to reduce also the level of sound being emitted by the jets. Surely there is a muffler you could put on these things - We are smart enough to send men into orbit but we can not control noise levels of our jets? Doesn't make sense to me. Thank you for your time. Sincerely, [REDACTED].

Langley, WA 98260

- 1.a. Thank You
- 1.d. General Project Concerns
- 2.a. Purpose and Need

I wish to express my concern about the EIS and expansion of services and flights out of NAS Whidbey. My concerns are based upon the impact of a 5 fold increase in flights regarding noise factor, increased risk of accidents, the economic impact and primarily because Whidbey Island is unlike any place I have ever lived...it natural beauty and serenity is literally we I moved thousands of miles to be in this unique location, changing my life to find peace and quiet. I urge that the growth of NAS be mitigated and that further exploration of having our national defense needs be taken into consideration...

Port Townsend , WA 98368

1.a. Thank You

4.q. Potential Hearing Loss

7.a. Regional Land Use and Community Character

I find the noise of the growlers to be disturbing, physically hurting my ears. It's also deeply unsettling to experience such a strong military presence in our region.

1.a. Thank You  
4.f. Noise Measurements/Modeling/On-Site Validation

February 19, 2017

[REDACTED]  
[REDACTED]  
Oak Harbor, WA 98277

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

Subject: Comments on the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island.

**EIS NOISE METHODOLOGY AND MEASUREMENTS NOT INAPPROPRIATE**

Central Whidbey is a quiet remote place. With little traffic, no commercial airports or industrial noise our ambient soundscape is peacefully quiet.

Unfortunately, that fact works to our disadvantage when factored into the day/night average computer model used by the Navy to measure the impact of noise on our community. A very quiet night enables the model to tolerate much noisier daytime activities.

Furthermore, the day/night averages are spread over an entire year, further using our ambient quiet to justify much louder operational periods. This significantly understates the impact on our community of proposed increases in noise from flight operations.

The EIS relies on a computer model to assess the impact of noise, but this model was developed for other uses and is not appropriate for this case study. Not least, the methodology uses no actual noise measurements. Anyone who has experienced the bone rattling, fear provoking peak noise events under these very loud low-flying planes knows that there must be something wrong with the conclusions and recommendations presented in the EIS.

The Draft EIS use of mathematical models, without actual on-the-ground measurements does not correctly or adequately address the proposed impacts on our community. This is a flaw in the Draft EIS. We need a much more robust, specific and accurate assessment of the noise impacts of the proposed increase in operations. Once measured, I believe these will lead to different conclusions and recommendations.

Anti-noise is not anti-Navy. Scenario A, which calls for a nearly 6 fold increase flight operations at OLF, is simply too much for us and our community to bear. Even Scenario B, with a tripling of flight operations, will have a significantly negative impact on our quality of life.

Respectfully submitted,  
[REDACTED]



*Since your Migraine Headaches only last 12 hours each day, then my conclusion is that they're only half as severe. So you don't really have Migraines at all.*

February 19, 2017

[Redacted]

Oak Harbor, WA 98277

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

Subject: Comments on the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island.

**NAVY SHOULD ADD AND CONSIDER WIN-WIN ALTERNATIVES TO THE EIS**

The EIS presents 3 alternatives plus a "No Action" scenario. All the proposed alternatives result in a substantial increase of flights and associated jet noise on Whidbey Island. Every alternative presented has the effect of creating significant negative impact on the quality of life where we live, and where tens of thousands vacation. The alternatives presented are too narrow, uninspired and unimaginative.

Anti-noise is not anti-Navy. The Navy should accept the challenge to "think outside the box". The EIS should develop, consider and present additional alternatives which will substantially meet the Navy's strategic and training objectives, but do not destroy the quality of life on Whidbey and the surrounding region.

Possible additional alternatives not included in the current EIS include:

- Conduct a substantial portion of the flight training by flight simulator.
- Conduct a substantial portion of the flight training on an aircraft carrier at sea, away from the populated areas.
- Conduct a substantial portion of the flight training at alternative land based sites away from populated areas.
- Don't locate the entire Growler fleet at this single location. Share the fleet and associated training with other bases both to diversify the sole location risk and also reduce number of flights on Whidbey.

These are examples of alternatives. Navy should engage private and public sector experts, as well as internal staff to develop other potentially viable alternatives, and add these to the EIS. Implementing one or a combination of these could produce a far better outcome.

As presented the Draft EIS results in only win-lose outcomes. We implore the Navy to conceive and implement alternatives that create a win-win solution, both for the Navy and for the residents and visitors to our region.

Respectfully submitted,

[Redacted Signature]

1.a. Thank You

2.n. Alternatives Considered But Eliminated

February 19, 2017

[Redacted]  
[Redacted]

Oak Harbor, WA 98277

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

Subject: Comments on the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island.

**EIS MUST ADDRESS WATER POLLUTION**

Just days after the EIS was released, the Whidbey community was confronted with the alarming revelation of serious pollution of our island aquifer by the chemicals perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA). The community was shocked to learn that water, from both private and public wells, was contained these chemicals, and in several instances exceeded the EPA's Health Advisory Levels by as much as 6 fold. We also learned that at least one of the wells supplying the town of Coupeville contains these harmful substances at measurable levels.

Additionally, we learned that a plume of 1,4-dioxane, classified by the EPA as a probable human carcinogen, is present in our island aquifer near NAS Whidbey and appears to be expanding.

Navy flight operations may present other threats to our island water, such as potential contamination by use, spillage and dumping of jet fuel, and its potentially harmful byproducts such as benzene.

Yet the EIS did not address impacts on water, water pollution and subsequent impacts to the environment and to health. This is a serious flaw in a document intended to comprehensively identify possible impacts of increased Navy operations.

The EIS must address historical, present and future water pollution issues, implications and mitigation. The Draft EIS does not, and therefore, in its current iteration, is insufficient and inadequate.

Respectfully submitted,

[Redacted Signature]

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 17.a. Hazardous Materials and Waste Impacts





## Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]
2. Organization/Affiliation [REDACTED]
3. Address [REDACTED] Port Townsend Wa
4. E-mail [REDACTED]
5. Please check here  if you would ~~NOT~~ like to be on the mailing list I would
6. Please check here  if you would like to receive a CD of the Final EIS when available

Living in Port Townsend has afforded me the peace and solitude that I had always dreamed of while living in Seattle. The noise from these planes will have a large detrimental effect on that. The noise from these planes disturbs me and the wildlife on my 5 acres. The Olympic national Forest should not be used as one big war experiment with it having a huge effect on the bird populations. The electromagnetic radiation is not something that can not have an effect on bird, insect, and bat populations. We don't need the government expanding its war toys while schools and infrastructure continue to decline.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 19.d. Electronic Warfare
- 2.a. Purpose and Need
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

SEQUIM, WA 98382

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 19.d. Electronic Warfare
- 2.a. Purpose and Need
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

1.a. Thank You

Clinton, WA 98236

Training is critical to land on those carriers. Very proud its being done here on Whidbey Island!

nordland, WA 98358

I strongly object to the timing of the release of this document and the short timeframe for comments over the holiday season. I have gone to the Port Townsend Library and they don't even have a copy of the EIS yet on the shelves.

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Nordland, WA 98358

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Sir/Madam, My comments are limited to two broad categories: the inadequacy of the noise analysis and the inadequacy of the scope of the EIS. There are many other topic that need to be addressed, but these are the two of the most flagrantly flawed. The noise analysis I will excerpt a few references that make the point that the noise analysis is totally inadequate, and provide responses to those statements. The italicized citations include the pages of the original wording. "The primary noise metric for quantifying noise exposure is the Day-Night Average Sound Level (DNL). (pg A15)" High intensity and intermittent noise such as that analyzed in the EIS simply cannot be accurately evaluated on a 24 hour average. For example, the 24 hour average of a gunshot at close distance every 4 hours would clearly not reflect the actual impact of that type of noise. A 65 dB average over 24 hours can be a result of intermittent deafening noise! The noise analysis that was based on this averaging becomes, therefore, invalid. "NOISEMAP is the model for airbases and is most appropriate when the flight tracks are well defined, such as those near an airfield. (pg A21)" The impacts of this project extend hundreds of miles from the airfield and so this model is not a valid one to use for the analysis. "Population counts of people residing within 5 dB bands of DNL from 65 dB to 95 dB were computed using 2010 Census block-level data. (pg A23)" Many humans live far from the area described and are impacted. Countless individuals in wildlife populations are extremely sensitive to noise and must be included in the analysis. "Research has indicated that about 87 percent of the population is not highly annoyed by outdoor sound levels below 65 dB DNL (FICUN [Federal Interagency Committee on Urban Noise], 1980). Most people are exposed to sound levels of 50 to 55 dB DNL or higher on a daily basis. (pg ES-5)" The committee on urban noise might be surprised to hear their analysis applied to the designated wilderness backcountry of a national park. Most of us might be exposed to 50-55 dB, as we are vacuuming our carpets, but this does not make it acceptable to inflict the AVERAGE 65 dB on wildlife or humans in wilderness settings. "The public would hear noise from aircraft overflights if they are in the vicinity of an event. However, these effects would occur on a temporary and intermittent basis. (pg 4-3)" The 'vicinity' of these overflights consists of a broad swath of land which includes a National Park, National Forest, and National Marine Protections areas. That the effects would be intermittent and temporary is little consolation for the wildlife whose habitat has been destroyed. The sound level 'of a passing automobile' is a moot issue for endangered species that exist nowhere near road traffic. Scoping I will excerpt, and respond to, just a few of the DEIS passages that prove that the scope of the document is inadequate. "Minimal habitat loss from construction activities would not significantly impact terrestrial wildlife because construction is within the urban/industrial area of the installation and has habitat of poor quality and would not impact marine habitat. (pg ES-8)" To limit the analysis on "Biological Resources" to habitat loss from only the construction activities and not the flight activities at the airfield is a flagrant disregard of the requirements. "Growler usage of Special Use Airspace is not within the scope of this study. (pg A15)" The EIS needs to provide an analysis of impacts beyond simply takeoffs and landings. Cumulative effects must include all aspects of the increased flight traffic. By considering only takeoff and

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.g. Cumulative Impacts of Noise
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.p. Sleep Disturbance
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. "In addition, 2021 is when events at Ault Field for aircraft loading, facility and infrastructure assets, personnel levels, and number of aircraft unrelated to the Proposed Action are expected to be fully implemented and complete. Therefore, with these other actions complete, the analysis isolates the impacts of this Proposed Action of adding additional Growler aircraft, personnel, and associated construction. (pg 4-1)" The DEIS cannot "isolate' certain aspects of increased intensity use of the airfields from others. The analysis must use a current situation, not one that is 4 years in the future, as a true No Action Alternative, as the baseline by which it compares other alternatives. "These increases represent levels of operations similar to historic levels of operations experienced over the life of the airfield (pg 4-2)" The growler cannot be compared with previous aircraft which had a much lower noise impact. Chapter 4 states "The cumulative effects of Growler training associated with this alternative and Growler training that occurs outside the study area of this EIS, which are addressed in other NEPA documents, are analyzed in the cumulative impacts chapter of this EIS (see Chapter 5)." However, Chapter 5 is clear that the cumulative impact analysis is only for the study area: "For this EIS, the study area defines the geographic extent of the cumulative impacts analysis. (pg 5-2)" My comments address only a few of the most obvious and flagrant omissions and deceptions contained in this document. I would also like to express my personal feelings, though they don't have the substantive legal standing of the others. I live within earshot of the Growlers, I recreate in the wild areas under the flight path of the Growlers, I try to sleep with the sound of warfare wafting in my windows. Yet I am not nearly as impacted as the unfortunate humans and wildlife that must suffer the noises from closer range. And for what reasons are we being asked to support in the Growler program? Greater "Electronic Attack" capabilities... Is that the euphemism for the "Sublethal Warfare". The testing of 'sublethal warfare' is attempting to use either high volume noise or heat producing radiation to instantly debilitate the 'targets' (e.g. the people) on the ground. Is it our Growlers that will be the purveyor of this newfound system of remote torture? There is absolutely nothing about this program that will foster peace, reduce human suffering, slow climate change, or demonstrate care for the planet or its inhabitants. This is a monstrous document, in all senses of the word. A thorough critique of its failings would probably generate a document as massive as the EIS. I strongly encourage that this document be remanded back to the Navy and insist that the fundamental flaws be corrected so that the public can evaluate these projects in the manner legally afforded to the citizens under NEPA. Sincerely [REDACTED]  
Nordland, WA 98358

Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name [Redacted]

2. Last Name [Redacted]

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Friday Harbor WA 98250

5. E-mail [Redacted]

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 10.m. Impacts to Marine Species and Habitat
- 10.n. San Juan Islands National Wildlife Refuge
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

## Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**

3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**

4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

**Action: Noise levels should only be averaged over active flying days.**

5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

**Action: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**

6. The Draft includes some independent noise measurements and ignores others.

**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**



7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

*How can we San juans Islanders continue to be subjected to such noise levels? What are the impacts to our marine mammals?*

1.a. Thank You

Victoria, British Columbia V8N 2S2

In the interests of international cooperation, I am writing to express my family's dismay at the growing amount of noise from the Growlers that are shuddering our home in Saanich near Victoria BC. It is our understanding that our Members of Parliaments in this affected region have not been responded to on this urgent issue of noise pollution. I would appreciate a response as a matter of respect. Thank-you, [REDACTED]

Friday Harbor, WA 98250

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Move the Growler training operation elsewhere. Naval Whidbey is no longer a good place for Growlers because there are simply too many people negatively impacted. The backlash will only get more difficult for the Navy as more people move into the area.

To:

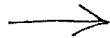
EA-18G Growler EIS Project Manager  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard  
 Norfolk, VA 23508  
 Attn: Code EV21/SS

January 20, 2017

The Navy should not be allowed to fly on weekends over the Olympic Peninsula at all. The EIS acknowledges, that the Navy will cooperate with local officials and populations by not flying training missions on weekends and holidays. You have not consulted with municipalities and other tourism and recreation businesses to determine it is unwise and irresponsible to fly on weekends. One hundred and sixty (160) jets and weekend flying also invalidates the Navy's already highly flawed noise-level projections.

Flying on weekends does nothing to rebuild the broken trust between the Navy, the Forest Service and the public. Why would you only avoid interference with Big Game Hunting Season? The majority of the population of the Olympic Peninsula relies on the exact same area - year-round - for recreation, business, tourism, fishing, community events, and a peaceful and sane quality of life.

I object to the increase in Growlers and their extremely loud and destructive noise. Weekends are peak times for local economies, citizens and communities. To have that quiet obliterated by jet noise from a rapidly expanding mega-base spells economic doom. People come here throughout all four seasons to relax in peaceful, unspoiled surroundings. Please fly your Growlers over less populated areas, like Eastern Washington. There has been minimal notification of your ramped up activities and destructive noise to the majority of the population affected, namely greater Seattle area. You have provided zero notification to the mainland population that recreates, lives and supports the Olympic Peninsula. What a shock it will be to these citizens that they have all been duped by your illegal tactics.



- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 3.i. Runway Operating Hours and Flight Schedules
- 4.a. General Noise Modeling
- 4.t. Noise Mitigation

Flying training missions on weekends is not mentioned in the Navy's Growler jet draft environmental impact statement (EIS), yet the Forest Service's draft permit says the Navy will be allowed to fly on weekends! Why is this additional flight time period not mentioned in the EIS? To not disclose weekend flying in the EIS is illegal and immoral.

The Growlers should not fly over the Olympic Peninsula are all! If some do, then you must mitigate the extremely loud and destructive noise that you will generate and cause economic <sup>turn</sup> ~~down~~ <sup>down</sup> for the citizens! There are <sup>many</sup> ~~many~~ methods, yet your extremely loud noise needs to be attenuated by: 1) flying higher 2) put a muffler on those dangerous loud Growlers! 3) avoid all towns with populations 4) avoid the National Park and endangered species and 4) fly over the more minimally populated regions of Eastern Washington just 10-15 minutes away and 5) NEVER fly on weekends!

Respectfully,

  
contractor - project manager

Camano Island, WA 98282

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Camano Island, WA 98282

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Camano Island, WA 98282

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.



, WA 98282

1.a. Thank You

4.I. Points of Interest

7.d. Recreation and Wilderness Analysis and Study Area

Whidbey Island Naval jet noise pollution is not limited to Whidbey Island. Camano Island may not "feel" the rumble of the jets, however the disruptive and outrageous noise is just as irritating to the serenity that used to be the norm on Camano Island. This noise pollution is more intense and more frequent than in 2012. It is this expansion of affected area with the change in noise level along with the increased operation schedule that is at issue. Simple common outdoor activities are made impossible when the Navy jets are circling on Whidbey Island and the repetitive, disruptive loud noise completely drowns out any sense of the outdoors. I cannot understand how such a planned program has been allowed to happen. It was not even an issue in 2012 and now it completely dominates any outdoor activity. The environment is being snuffed out by the Navy jets.

Port Angeles, WA 98363

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the

technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS

that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly

at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health

advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the

question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]



Sequim, WA 98382

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, As a vacation rental property manager on the Olympic Peninsula I am very concerned about any increase of Naval jet activity. The EIS does not seem to acknowledge that people and wildlife are affected by these activities from a greater distance than the area shown in the study. My home is located in the Sequim area and we often hear carrier landing practice. Weather and wind can increase or decrease the noise. There are times when it can become very tiresome and annoying, even shaking the house, rattling windows. However, I do appreciate that our pilots need to be well trained. What concerns me is it does not seem you fully understand the impacts that you currently have. I am a volunteer at Dungeness National Wildlife Refuge. This is one of the most visited attractions in the region. Growlers certainly can be heard from the Refuge and disrupt an otherwise peaceful nature experience. On several occasions I have seen EA-18s flying low (less than 1,000 ft), over or just off of the Dungeness Spit. The P-3 Orions are frequently seen and heard as well. While they are not as loud as the Growlers, they can be a disruption to an otherwise quiet day or night. Outside of Protection Island it seems impacts to DNWR have not been evaluated. I often actually enjoy seeing the growlers overhead but I am concerned that any increase in activity is going to have a negative impact on tourism in the area and impact my livelihood. The current level of activity is already much more noticeable than the EIS seems to indicate. I find that concerning. Another note is that jet noise is already having an impact on property values and the desire of people to move to this area. I was approached recently by a potential home buyer in the Sequim area and her primary concern was how loud the jets are. People from outside of Washington are becoming aware of this issue and it may be a significant factor in whether they decide to relocate here. Other concerns include: 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. Jet noise does impact us here in Sequim. 2. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville

warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 3. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is “turning out fully trained, combat-ready Electronic Attack crews.” 4. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 5. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, “...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives.” 6. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been

evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 7. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 8. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense. 9. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. 10. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 11. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

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Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 17. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. This especially concerning north of Sequim where many private pilots use the airspace for practice flights and aerobatics. I personally witnessed a close call between a pilot performing aerobatics in a biplane and a P-3 Orion over the Dungeness Spit last year. 18. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 19. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 20. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED] Sequim, WA

Port Angeles , WA 98363

I am requesting a 60 day extension beyond the Jan. 25th deadline scheduled for public comments to the draft EIS proposal for 36 additional Growlers to be stationed at NASWI for electromagnetic warfare training over ONP/ONF. The current deadline follows the busiest time of year for families most adversely affected by this proposal and is reminiscent of the single 8"X11" notice in the Forks post office window announcing the draft EIS for permitting the range to the everlasting shame of both the Navy and ONF. This schedule appears to once again intentionally subvert the spirit/intent of the NEPA process by overlapping the submission schedule published by ONF's final EIS permit for the range and emitters, thereby effectively limiting public input for the 36 additional Growlers, expected to be extensive/overwhelmingly negative based upon public outcry already of record to ONF's permitting of this range proposal. This is NOT the behavior of a "friend" to our citizens.

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Kirkland, WA 98033

There is a very limited amount of pristine, natural acreage left in the United States. It would be a damaging and short-sighted decision to use the Olympic Peninsula in the proposed manner. Please take action to preserve the ecosystems on our fragile planet rather than damage and destroy them. Think of the future, long-term impact of what you are proposing. Thank you.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

7.d. Recreation and Wilderness Analysis and Study Area

Port Angeles, WA 98363

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources



know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the

technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS

that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at:

<https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly

at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health

advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the

question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,”

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National

Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able

to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." (<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards



is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. 13. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments,

along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight

operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires

frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,”

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within

existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing

using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is “turning out fully trained, combat-ready Electronic Attack crews.” 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, “...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives.” According to a memo from the President’s Council on Environmental Quality (CEQ) to all federal agencies, “Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air

Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. 13. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs

include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is



higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals. (<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been

piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF)

Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this

many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." (<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the

ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. 13. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled “Representative Sound Levels for Growler Aircraft in Level Flight,” on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, “...but may be developed and altered based on

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concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be



affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That’s more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA) 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into

multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." (<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA]

Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative.

9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula.

10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas.

11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense.

12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting

a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. 13. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at:

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(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to

consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.
2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).
3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process,

as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is “turning out fully trained, combat-ready Electronic Attack crews.” 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, “...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives.” According to



a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant."  
(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled

communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further

states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with

contamination of residential drinking water due to what it calls “historic” use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS,

except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have

recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors

who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant."

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(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game



Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled “Representative Sound Levels for Growler Aircraft in Level Flight,” on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, “...but may be developed and altered based on comments received.” Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be “...identified in the Final EIS or Record of Decision.” Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy’s proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, “No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and

operation of additional Growler aircraft.” While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls “historic” use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals. (<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature

cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]

Sequim, WA 98382

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic 6506 Hampton Blvd. Norfolk, VA 23508 Attn: Code EV21/SS Dear Sir/Madam,  
Thank you for extending the comment period to February 24, 2017, in order  
accommodate the fact that having four major public processes open over the holidays, all  
concerning Navy activities or the biological resources that may be affected by them,  
made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise  
outside the immediate environs of the runways on Whidbey Island is not being evaluated,  
yet impacts are significant. Noise from EA-18G Growlers is affecting communities far  
outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft  
Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6  
to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels  
(dB), use these runways to get airborne and to land; therefore, what happens outside the  
study area cannot be ignored as if it does not exist, because all flight operations are  
functionally connected to takeoffs and landings. By considering only takeoff and landing  
noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS  
fails to consider the wider area of functionally connected impacts caused by naval flight  
operations. By failing to consider the interdependent parts of a larger action that cannot  
proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate  
cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered.  
The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic  
resources that it also fails to consider significant nearby impacts. The State Historic  
Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.  
([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within  
existing APE boundaries be adversely affected, but additional portions of Whidbey Island,  
Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise  
areas that will receive harmful levels of sound and vibration from Growler activity. The US  
Department of Housing and Urban Development posted noise abatement and control  
standards that classify the 65 dB levels being used by the Navy as "normally  
unacceptable" and above 75 as being "unacceptable."  
(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have  
recorded noise at least twice that loud. Therefore, by failing to include these areas, this  
DEIS violates both the National Environmental Policy Act (NEPA) and the National  
Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative  
effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing  
activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at  
least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A  
2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced  
Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler  
electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing  
activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process,  
as confirmed by news reports and a Navy official at a recent open house, for 42 more jets  
to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the

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“presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly

at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health



advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the

question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED] Sequim, WA 98382

December 6, 2016

To: EIS Project Manager EA-18G  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Blvd  
Norfolk, VA 23508  
Attn: Code EV21/SS

From: [REDACTED]  
Oak Harbor, WA 98277

Property owner at Dugualla Bay  
Due East of NAS Whidbey Island  
East/West runway

We purchased this property in 1995 and were advised by our appraisal report that we are in NZ-2, noise zone two, which by AICUZ study suggests that residential land uses should be discouraged, however, many properties carry NZ-2 but are actively bought and sold in the local housing market. Not only is this true in this area but also includes most any property near NASWI and the OLF near Coupeville. Any property bought or sold in these areas has been advised by Island County statute that said property is in a particular noise zone and that the buyer is aware of this fact. Any group or person that states otherwise is not stating the truth.

I might suggest a few improvements:

1. Limit flying hours from 0700 to 1100 hrs, done at Orange County airport in CA
2. Fly mostly week days
3. Publish flight schedule at OLF a week in advance
4. Any decision concerning flights should be made by
5. CO of base and needs of the Navy

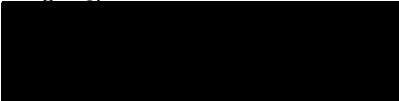
The bottom line is that if he did not like the area due to jet noise, we would sell the property and move. I suggest they any group or person that is not happy with the noise to sell and move out, possibly a fund and/or group could be established to offer said person the current appraised Island County property amount and move out and property resold to new owner.

I trust that the Navy will be able to base any and all EA-18G 's at

1.a. Thank You  
12.k. Compensation to Citizens for Private Property  
2.n. Alternatives Considered But Eliminated

NAS Whidbey Island.

Regards,



Shoreline, WA 98155




Do not allow any climate change exacerbating additional Growlers on Whidbey Island, that would wreck havoc on on future climate, and birds, and the noise on the Olympic Peninsula when used in that area.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 18.d. Washington State Greenhouse Gas Goals
- 19.h. Cumulative Impacts on Biological Resources
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name 
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Citizen, resident of Coupeville*
3. Address  98239
4. Email 

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

### Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I moved here & bought property to retire. Avoiding the jet noise, pollution, and damage to this beloved community is the most frightening aspect to arise. The NAS has options they are not considering. Please, please save this beloved historic community that you fight to defend. Thank you!!

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED]

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

1. ~~We need~~ Please extend the deadline for comments - 6 mos if possible. Please!
2. Please reduce the size of ~~your report~~ The EIS - maybe 300 pages. The sheer volume of this size report points to padding and double speak.
3. Please show results of analysis for how this increase in noise will impact ~~our~~ our children. I don't see it addressed.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to: →

Naval Facilities Engineering Command Atlantic

6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

4. I think your estimation of 65 db is WAY off. You are not hearing what I am.

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects



All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

I am NOT anti Navy or military. My concern is that you (Navy) are not even trying to find peaceful alternatives to increased use of OLF. ~~It~~ only justifying your claims. We ALL live on this island and need to preserve the quality of life for everyone. They are not mutually exclusive.

Thank you for <sup>answering</sup> considering these issues



For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:  
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name [Redacted]  
2. Last Name [Redacted]  
3. Organization/Affiliation \_\_\_\_\_  
4. City, State, ZIP LOPEZ ISLAND, WA 98261  
5. E-mail [Redacted]

6. Please check here  if you would NOT like to be on the mailing list  
7. Please check here  didn't mean to check if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

★ **Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. CLOUD COVER AMPLIFIES THE NOISE ON THE GROUND FROM FLYING PLANES—!—**

3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**

4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

**Action: Noise levels should only be averaged over active flying days.**

5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**

6. The Draft includes some independent noise measurements and ignores others.

**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

IN ADDITION TO THE <sup>35/36</sup> ~~35/36~~ GROWLERS IDENTIFIED  
 THERE ARE 40 ADDITIONAL GROWLERS NOT ADDRESSED,  
 BRINGING THE TOTAL AT AULT FIELD FROM 117/118 TO  
 157 GROWLERS — THIS WAS NOT ADDRESSED IN THE  
 IMPACT ON THE AFFECTED ENVIRONMENT —  
 PERSONALLY I SPEND A SIGNIFICANT AMOUNT OF  
 TIME OUTSIDE ON THE NORTH END OF LOPEZ OR  
 IN MY STUDIO IN LOPEZ VILLAGE, WHEN GROWLERS  
 FLY OVER OR NEAR IT FEELS AS IF A FREIGHT TRAIN  
 IS ABOUT TO RUN YOU OVER — NO CITIZEN SHOULD  
 BE SUBJECTED TO THIS LEVEL OF DISTURBANCE!

01/08/16

[www.QuietSkies.info](http://www.QuietSkies.info)

Lopez, WA 98261

I implore whoever has the authority to relocate Air Force training exercises from an area where the noise from Growler jets is harmful and intrusive on the public, to a more desolate, less populated area. The island and peninsula areas of the Pacific Northwest is no place to fly these obtrusive, loud aircraft. Many times in the last few years I have had to stop a conversation, or haven't been able to hear the TV or radio when these Growler aircraft have flown over my house or work. I hate to imagine this intrusion escalating. Whoever are the powers that be in this situation. Put yourself in a peaceful environment. An environment that has been generally quiet. And imagine planes roaring overhead day after day. It's simply a reduction in quality of life. I ask that the fighter jets be moved to a desert area like most other Air Force training areas.

1.a. Thank You

12.n. Quality of Life

2.n. Alternatives Considered But Eliminated

4.n. Speech Interference (Indoor and Outdoor)

Coupeville, WA 98239

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.



Coupeville, WA 98239

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Coupeville, WA 98239

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Freeland, WA 98249

1.a. Thank You

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Freeland, WA 98249

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Freeland, WA 98249

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Seattle, WA 98104

1. It is not legal under the National Environmental Policy Act (NEPA 40 C.F.R. § 1502.4) to segment multiple aircraft training and testing activities affecting the Olympic Peninsula into at least six separate actions including four squadrons of P-8A Poseidon Multi-Mission Aircraft; a 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 2012 EA (26 Growlers including 5 from a reserve unit); 2014 EA (Growler electronic warfare activity); and the current 2016-2017 DEIS (36 Growlers). The cumulative impacts of these related actions must be analyzed together because together they are likely to have a significant impact. 2. Growler jet noise outside the immediate area surrounding Naval Air Station Whidbey Island (NASWI) was not evaluated in the DEIS. The Navy's proposed military exercises under its Northwest Training and Testing program are associated with a wide variety of inland and offshore stressors expected to impact murrelets for the next 20 years, and these thousands of flights originate from NASWI. These exercises include sonar, detonations, explosions, helicopter rotor wash, and projectiles, which can cause auditory and/or physical injury to murrelets. So called "threshold shift" causes "decreased hearing capability, at specific frequencies, for periods lasting from hours to days, or permanently" (USFWS 2016). The Navy estimates these military exercises will "take" a total of roughly 112 murrelets over the next 20 years, though this may be a gross underestimate because it does not account for the cumulative impacts of potential exposure to multiple stressors many times and places within foraging and nesting areas for up to 20 years. Adding such significant threats to murrelets cannot be justified, because "given the current status of the species and background risks facing the species, it is reasonable to assume that murrelet populations in Conservation Zones 1 and 2 and throughout the listed range have low resilience to deleterious population-level effects and are at high risk of continual declines. Activities which degrade the existing conditions of occupied nest habitat or reduce adult survivorship and/or nest success of murrelets will be of greatest consequence to the species" (USFWS 2016). These military activities will certainly worsen murrelet population demographic rates and likely magnify other existing levels of "take" occurring elsewhere. The Navy must prepare a Supplemental EIS to analyze the cumulative impacts of ALL military operations on the Washington state endangered marbled murrelet population in the context of other causes of take being permitted. 3. When military aircraft noise exceeds 92 dBA SEL at a nest site, USFWS (2015) expects significant behavioral responses to occur, including an adult murrelet avoiding or delaying nest establishment, an adult murrelet flushing from a nest or perch within the vicinity of a nest site, or an adult murrelet delaying or aborting one or more feedings. Growler aircraft are capable of 150 dB at takeoff and thus could easily cause significant behavioral responses by murrelets and other species many times over a significant proportion of the nesting population. The Navy cannot fairly claim that wildlife are "presumably habituated to the very high level of noise and visual disturbances at NAS Whidbey Island" especially when the impacts of the training flights occur primarily outside of the Growler DEIS study area. 4. All DEIS alternatives propose to increase jet noise and related impacts. At least one alternative should be evaluated that decreases jet noise and related impacts and significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures: 500 to 1,000 feet is far too close to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 10.a. Biological Resources Study Area
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.d. Per- and Polyfluoroalkyl Substances
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

avoid impacting the public and wildlife, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets (per Aircraft Environmental Support Office guidance). "Sparsely populated areas" presumably includes large areas of state and federal lands where a substantial proportion of the murrelet population nests and is subject to jet noise disturbance. 5. There is significant new information about impacts that were not disclosed in the DEIS, requiring that a Supplemental EIS (SEIS) be prepared with another public comment period to properly assess these greater, undisclosed impacts. This includes flight operations on weekends and the planned arrival of approximately 42 more Growlers in addition to the 36 evaluated in this DEIS. The DEIS also failed to disclose the Aircraft Environmental Support Office guidance directing Growlers to fly at very low altitudes. A SEIS must also include an analysis of the contamination of drinking water and soil near the NASWI runways due to hazardous chemical use as a part of military operations. 6. The DEIS did not consider the most recent, best available science in its analysis. A SEIS should include an evaluation of at least two newer research articles addressing noise impacts on wildlife: "A Synthesis of two decades of research documenting the effects of noise on wildlife" (Shannon et al. 26 June 2015, Biological Reviews) and "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (Engels, S. et al 2014, Nature 509: 353 – 356). Thank you for seriously considering these comments.



1.a. Thank You

New York, SD 45048



Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Coupeville, WA 98239

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

Coupeville, WA 98239

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Coupeville, WA 98239

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month").

Coupeville, WA 98239

1.a. Thank You  
7.c. Noise Disclosure

Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.



Coupeville, WA 98239

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Coupeville, WA 98239

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

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Coupeville, WA 98239

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

Coupeville, WA 98239

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.



Coupeville, WA 98239

1.a. Thank You  
4.q. Potential Hearing Loss

I am concerned about noise levels for children and youth, whose hearing is still developing, during fly overs near the Coupeville schools.

Coupeville, WA 98239

1.a. Thank You

17.a. Hazardous Materials and Waste Impacts

I am very concerned about damage to water wells from jet fumes seeping into the soil for years. The jets should not be flying over so near to residential areas.

Coupeville, WA 98239

1.a. Thank You  
4.m. Supplemental Metrics

The jets fly 150-200 feet above our home when doing touch and go landings at OLF. The frequency is approximately one jet per 60-90 seconds. Things I cannot do when the jets are flying: gardening, relaxing on my deck, have a conversation or hear a comment from someone in close proximity, listen to music, concentrate to read, plus others.

Coupeville, WA 98239

The Navy promoted that the Growlers would be less noisy than the Prowlers. This is not true, and they were aware of misleading the public when promoting this change at Whidbey Island Naval Air Station. I'm concerned that the Navy may not be providing accurate information as they seek to increase planes, and subsequent activity, in the coming months.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 4.k. Comparison of the Prowler to the Growler

Coupeville, WA 98239

1.a. Thank You  
4.p. Sleep Disturbance

When the Navy uses OLF at night, I am unable to sleep due to the noise.

Coupeville , WA 98239

Dear Sir: Thank you for the opportunity to be a part of your process. As longtime residents of Coupeville, we are very concerned about the proposed continuance and expansion of Growler operations at OLF Coupeville. As it has been, the noise of Growler operations has verifiably, negatively impacted our community living, including numerous aspects of good health. To continue and even expand such operations is not acceptable. This is all not to mention the negative impact on property value and our local economy, if such an expansion is carried out. As it has been sincerely suggested before, these operations should simply be moved to a less inhabited location. A few minutes flight to Moses Lake/Hanford seems reasonable. Thank you for your consideration. Sincerely,

██████████

- 1.a. Thank You
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated
- 4.r. Nonauditory Health Effects

## 1.a. Thank You

Coupeville, WA 98239

I moved to Coupeville 30 years ago and believe I signed a "Noise Impact Zone" or something like that. Now, at times, the planes are noisy, but if that is part of the cost of freedom, then let them fly. The fliers make patriots proud but they need the facilities at OLF and I feel that everyone who does not want the Growlers, (or any other aircraft), there.. and moved there AFTER OLF should be invited to move...again... elsewhere. Only those who were here BEFORE OLF can complain. Needless to say, I hope the Navy has full use of OLF, now and into the future.

1.a. Thank You

14.b. Vehicle Collisions and Safety

[REDACTED]  
Noise / traffic safety at OLF SR 20

- ① - suggests moving road further south &/or cut back trees. As jets are coming in for touch & go, throttle increased right over road, sounds like the jet is going to crash & is startling

Hand delivered to Navy PFC team Feb, 16, 2017.  
[REDACTED]





## Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]
2. Organization/Affiliation CITIZEN
3. Address [REDACTED] OAK HARBOR
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

HAD EXPERIENCE WHEN DRIVING HWY 20 WHEN TOUCH E GO OCCURRED  
TAHOE NOISE SO EXTREMELY LOUD WE THOUGHT A PLANE  
WAS EXPLODING OVERHEAD. DISTRACTION NEARLY CAUSED  
HEAD ON COLLISION.

HAVE FRIENDS LIVING NEAR AUSTIN OUTLYING FIELD &  
EXPERIENCED THE FRUSTRATION CAUSED BY THE EA-18  
WHICH ARE FAR LOUDER THAN THE 16'S AND BECOMING  
MORE FREQUENT.

Please print - Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1.a. Thank You

3.h. Runway Usage, Flight Tracks, and Altitudes



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RE: CULTURAL RESOURCES & AMERICAN INDIAN TRADITIONAL RESOURCES

DECEPTION PASS STATE PARK IS THE NEXT THING TO BEING SACRED TO ALL NATIVE AMERICANS INCLUDING WE WITH EUROPEAN ANCESTRY.

ATTACHED IS THE SEPTEMBER ISSUE OF THE PARKS JOURNAL THE LAST PAGE OF WHICH DESCRIBES ~~VARIOUS~~ VIEWPOINTS THAT ARE POINTS OF REVERANCE DESERVING SPECIAL NOTE.

INCLUDED IS A LAST PAGE OF ANOTHER ISSUE WITH RELEVANT COMMENTS

Please print • Additional room is provided on back  
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**YOUR INPUT MATTERS**

- 1.a. Thank You
- 8.i. Deception Pass Cultural Resources

Deception Pass State Park

# CURRENT

September 2015

A monthly newsletter for the park's friends and neighbors  
from the desk of the park manager

## Raising the Roof

What is a good gift for an eighty year old?  
How about a new roof!

grew log by log to become the park's  
"superintendent's house".



*The log cabin near the old entrance, pictured in the late 1930s. Notice the large shakes on the roof, and the natural color of the oiled logs.*

The log home near the old park entrance is being crowned again.

It's one of the two residences built in the park by the Civilian Conservation Corps, the other being at Bowman Bay.

In 1935, using trees from Hoypus Point and young men from around the nation, this house

Never mind the fact that there was no superintendent yet. The park was ten years old, but the fledgling State Parks Committee that ran the agency had few employees.

The CCC boys learned how to construct log buildings through the instruction of 'local experienced men', expert craftsmen who knew various trades. Together they created a dream home in the remote woods of Deception Pass.

It was strategically located: right next to the park entrance so the superintendent could greet everyone who entered the park.

Every Deception Pass State Park manager from that time forth lived in this residence, until me. With the entrance moved a half-mile south, the house lost its strategic positioning.

But the stories abound for managers and the families who have lived here, stories from the mundane such a bats in the attic and visitors knocking on the door asking for sugar, to the odd and eclectic, with people showing up bloody from car accidents, or the time a man dressed as a goblin knocked on the door, looking for his car.

Or at least the manager thought it was a costume.

The house was crafted with care, with attention paid to the smallest detail. It was to be a place of honor for guests, the prime gathering place for staff, dignitaries, and visitors.

Over the years, the routine maintenance and requisite cost-cutting measures reduced the grandness of the abode. The brilliantly oiled honey-colored logs were painted a chocolate brown. The hardwood floors were covered with carpeting. And the distinctive 36" hand-split shakes on the roof were replaced with far cheaper mass-produced shingles.

Someday we will remove the chocolate paint. But now, thanks to historical preservation grants and capital money for protecting park resources, the aging and failing shingles are being replaced with the original style of double-rowed hand-split 36" shakes.

Finding old growth cedar for shakes like this is not easy. And installing shake roofs like this takes time and expertise. Fortunately we have Mark Lunz, our chief of maintenance, who can oversee



*Dale, Craig, Joe, and Matt lay out shakes and nail them to the roof of the historic structure*

and create a roof like this with the assistance of Todd Harris and other park staff and several region maintenance staff as well.

It is knee-bending and back-aching work, first shaping the shakes to fit properly with their mates below and on each side, and then nailing each one into place.

But when the work is done, what we have is a gem of rustic-era architecture that fits the park setting as if it belongs here, which it does.

The house that lives on in the memories of many families will continue to live on into the stories and lives of future generations.



*The interior of the cabin, set up for a formal dinner in the 1930s. The rock fireplace is on the left, and front door is on the back wall.*



## A Winter Storm in Summer

We knew it would blow. Park staff warned our Friday night campers of the coming wind storm predicted to hit us the next day, and that we may have to close the campground.

And we all knew in our heads that the trees



*Mark Lunz looks at large cedar branch that came down in a campsite at the Cranberry Campground, narrowly missing the truck and tent behind.*

were stressed by drought, and that deciduous trees were laden with full sails of leaves like spinnakers ready to catch the wind.

The actual experience of being in that kind of wind was everything we feared it would be.

It arose exactly as predicted, a few minutes after 8 a.m. Last year's needles fell around us like a blizzard of orange snow. By 10 a tree had fallen in the campground, an alder. Then small branches came tumbling down.

We closed the park to all day use by 11, just as the power went out for most of North Whidbey. By noon, two more trees had fallen in the campground, one hitting a restroom. We evacuated the campground, and many campers either left the park or went down to West Beach to ride out the storm free of the danger of falling branches or trees. Between noon and 2 p.m. the storm was at its peak, hitting gusts of nearly 50 miles per hour. We had to cut a few more trees

out of the roadways to allow visitors to exit the park, but otherwise did our best to keep park staff and visitors out of harm's way.

What was full campgrounds and busy beach areas in the park became ghost towns and wilderness at the height of the storm. Power lines came down throughout the Island and Skagit County areas as trees tumbled around like dominoes. Traffic signals were dark, creating four way stop intersections on Highway 20.

One group of young women parked at Pass Lake before the storm hit its peak, and wandered down the trails to West Beach. Once there, they realized they could not safely walk back to Pass Island. One of our camphost couples, Jim and Linda Hemans, saw their plight and opened up the West Beach shelter for them to get out of the wind. The Hemans then served them hot cocoa as well!

These are the kinds of days that test the mettle of our staff and challenge us to keep visitors and workers safe while protecting our infrastructure. Clean up now

continues for the next several days as we open campsites, repair a couple roofs, and get ready for full campgrounds once again on the Labor Day weekend.



*Ranger Ben Shook prepares to remove a tree from the roof of a restroom in the campground.*

## Imagine a Beach!

In October we hope to see a brand new beach at Deception Pass. Well, not totally new, just new in my lifetime.

In the late 1940s the then-called Department of Fisheries built a fish hatchery at Bowman Bay. To protect the tanks in the field, and to support the base of a new pier going out into the bay, they buried the beach with VW-sized boulders at the high tide line.

In the early 1970s, the fish tanks were crushed and buried in place. The pier -- and the rip-rap -- remained in place.

Thanks to many partners, led by the Northwest Straits Foundation, we have grant money to remove the boulders, re-shape the slopes to match the beaches on either side, and plant the native beach vegetation that belongs here.

Imagine that! Next year, it won't require any imagination at all to see a real beach for all of Bowman Bay.



### NOTICE of CLOSURE:

During the re-building of the Bowman Bay Beach, the entire Bowman Bay area will be closed to the public.

Construction will involve large trucks, backhoes, and the movement of hundreds of tons of rock and material, making the area unsafe for visitors.

#### Projected closure date:

Last half of October

## Droning On...

A car company came to us this past winter to ask if they could film a car advertisement by using a drone. Drones are illegal in State Parks at the present time.

We made an exception in this case as traffic would be stopped for the few minutes of the filming, so there would be no traffic distraction, and we felt a drone would cause less environmental impact than a hovering helicopter such as another car company used a few years ago.

The advertisement is now on the air. Check it out at:

<https://www.youtube.com/watch?v=f1vVmsfdZs8>

Not sure I understand what it is really saying, but the scenery is nice.

Recognize some of the locations?



## U. S. Representative Rick Larsen Visits Cornet Bay Beach Project

The Northwest Straits Foundation and Deception Pass State Park welcomed Congressman Rick Larsen to Cornet Bay this week.

Congressman Larsen wanted to see the results of the federal grant monies that have been invested in restoring the beach, here and to learn more about what it takes to make a project like this successful.

In the early 1970s, the beach was covered with fill material to create a larger parking lot and picnic grounds.

Unfortunately, the fill buried the habitat of forage fish, the prime source of food for salmon.

The Cornet Bay Restoration project was initiated in 2007 to improve nearshore habitat for salmon and forage fish spawning along this altered section of the shoreline in Cornet Bay in Deception Pass State Park.

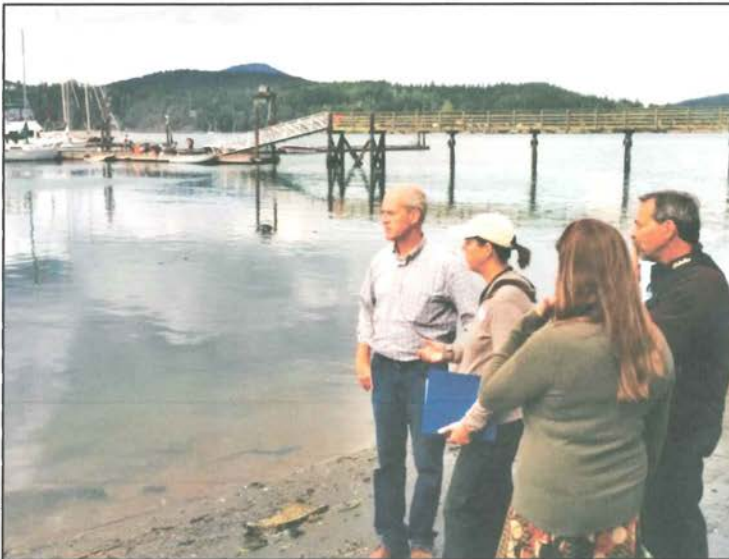
Funding came from a wide array of federal, state, and local grants and other support.

Project partners included the NW Straits Foundation, the Island County Marine Resources Committee (MRC), Oak Harbor, and the Washington State Parks and Recreation Commission.

The project removed a creosote bulkhead stretching along 750 feet of the beach, brought in

1200 tons of beach spawning gravel, and planted native vegetation to create a more natural shoreline. Over 800 linear feet of shoreline and 1.24 acres of beach and upland were restored.

Congressman Larsen has supported and continues to support projects such as this which help protect our beaches and restore our natural habitat, resulting in stronger salmon stocks and healthier communities for us all.



*Representative Rick Larsen looks at the Cornet Bay beach restoration project, with Program Director Joan Drinkwin of the Northwest Straits Foundation, Executive Director of the Foundation Caroline Gibson (back to camera), and incoming President of the Foundation, Lenny Corin.*

Although Representative Larsen knows the Whidbey Island area very well and visits here frequently, he said this was first visit to Cornet Bay! We are honored to have him visit here.

## Upcoming Capital Projects

Several capital funded projects are in store for Deception Pass for the next two years. These include the following:

- Connecting the Quarry Pond campground to our sewer system, allowing us to pump effluent to the Navy Base where it is treated appropriately. The current septic tank system and drain field have reached the end of their life. Goal: Winter 2015
- Upgrade our main sewer system pumps and storage capacity. Our current pumps, that handle all of the sewer south of the bridge, are not big enough to keep up with the effluent and pump it all the way to the Navy Base. And the storage tank is so small the pumps are kept busy far too often during the day. New pumps will assure us many more years of getting the effluent out of the park. Goal: Winter 2015
- Cornet Bay pier and moorage docks replacement. The docks have outlived their life expectancy, and they have a negative impact on the eelgrass beds below. A new design with new docks will give us more efficient moorage and help eelgrass beds return to this critical habitat. Goal: Summer 2017
- Upgrade campground restroom #2. This forty year old restroom needs to be modernized to be more efficient and healthy. Goal: Winter 2015
- Upgrade Cornet Bay Retreat Center cabins. We hope to renovate three more of the 1950's cabins to be family friendly, rentable in the off-season by a family or small group of people, and still useable by large groups during the busy season. Goal: Spring 2016
- Re-roof several buildings in the park. The duplex at the retreat center, the barn and residence at Pass Lake, and maybe the storage shop at our maintenance complex all have failed roofs. Goal: Summer 2016
- Replace riprap at Bowman Bay with a real beach (grant funding) Goal: October 2015
- Remove more fill at Cornet Bay to create a real beach (grant funding) Goal: Winter 2015

## Of Lakes and Toxins

Cyanobacteria, toxic algae, blue-green algae – whatever the name, a lake by any name can be just as toxic if this growth is present with their accompanying toxins.

Two toxins in particular are found locally in the cyanobacteria: microcystins and Anatoxin-a. Microcystins can cause fatal liver damage; Anatoxin-a can cause neurological poisoning that causes death in a very short time.

Our state Department of Health established a limit of 6 micrograms of microcystins per liter of water, and one microgram of Anatoxin-a per liter of water. Cranberry Lake has microcystins at a level of just over 1, so for now that is not our concern. However, three weeks ago, Cranberry Lake had an Anatoxin-a level of about 1.5, just over the limit, so we closed the lake. Last week it tested at over 2. This week it is at 4.9, so it is definitely going in the wrong direction.



Blue-green algae with a distinctive "blue-paint" patch

The lake remains closed. It wouldn't take much to ingest enough of the toxin to cause serious problems.

Unfortunately, not much is known about these toxins, at least not enough to know how to bring their levels down safely and effectively.

Pass Lake was tested this week, and showed no problems. Two years ago it closed in November, during freezing weather, when toxins approached the critical level.

We take the health of our visitors very seriously, and we take the concern of these toxins very seriously as well. A big thank you to our Island and Skagit County health departments, and to Maribeth and Polly respectively, for their assistance in monitoring these lakes and promptly sharing the results.



## Deception Pass Park Foundation

Ongoing Education Presented by the  
Deception Pass Park Foundation:

*"Take a Class at Deception Pass"*

### Forest Ecology

*of the last remaining old growth forest of the  
lower Puget Sound basin*

*With Dr. David Shaw*

**Saturday, October 17**

*8 a.m. To 3 p.m.*

*Meet at the Cornet Bay Boat Launch parking  
lot in Deception Pass State Park*

Puget Sound. The Salish Sea. The old growth forests of Deception Pass State Park sit on the edge of this body of water which many over the centuries have called home.

These forests are some of the few remaining old-growth forests in what is called the lower Puget Lowland Trough. These forests are sitting on the precipice of momentous change, given the prediction of sea level rises and climate change consequences.

Have you ever wondered what makes a forest an "old-growth" forest? What makes it healthy and what makes it, well, or sick?

Join Dr. David Shaw on a one-day field trip into the heart of these forests to learn more about trees, forest change (succession), forest insects, diseases, fires, climate (fog, drought), and the possible changes ahead.

*See the next page for a peek at the poster  
describing this class.*

### Park Mammals Up Close

Come and enjoy the next educational course offered by the Deception Pass Park Foundation. This one day class will present and explore the mammals found within the park and surrounding waters.

Come and enjoy the skins and skulls prepared by our own Matthew Klope. This will be your chance to study up close the mammals that elude us most of the time.

Date: **Saturday, September 26**

Time: 9:00 - 3:00

Cost: \$20 (Members) \$30 (Non-members)

Location to be announced.

Bring your own lunch

Call Jack at 360-675-3767 (ext.26) to register,  
or email him at jack.hartt@parks.wa.gov

#### Deception Pass Park Foundation Board

President: Liz Merriman

Vice President: Barb Shaw

Secretary: Steve Young

Treasurer:

Board Member: Jill Johnson

Board Member: Matt Klope

Board Member: Brian Shelley

Board Member: Rick Colombo

Board Member: Terica Taylor

[www.deceptionpassfoundation.org](http://www.deceptionpassfoundation.org)



Like, follow, and stay  
current with the Deception  
Pass Park Foundation on  
Facebook at

"Deception Pass Park Foundation"

# Take a at *class* Deception Pass: Forest Ecology

*The Last remaining Old Growth Forests of the Lower Puget Sound Basin*

*With Dr. David Shaw*

**Date: October 17th**

**Time: 8am-3pm**

**Where: Cornet Bay**

**\$35 members**

**\$50 non members**

*<http://www.deceptionpassfoundation.org/events/forest-ecology--with-dr-david-shaw/>*

Space is limited, Discover Pass required

*About the class:*

This guided forest walk will touch on topics ranging from fog regime changes, forest changes, in-growth Grand fir, dwarf mistletoe and more.

On the morning of October 17th the group will meet at Cornet Bay. The hike will range from easy to moderate trails. Please bring your lunches for a break between hike in Hoypus Point and Hoypus Hill.

*About the instructor:*

Dr. David Shaw is the assistant professor in the department of forest engineering, resources and management at Oregon State University. He received his PhD from University of Washington in 1991. He specializes in forest health, forest pathology, forest entomology, forest ecology, mistletoes, insects/diseases, interaction with fire, silviculture and management. If you would like to learn more about Dr. Shaw please check out:

<http://ferm.forestry.oregonstate.edu/facstaff/shaw-david>



*For more information check our website at:*

[www.deceptionpassfoundation.org](http://www.deceptionpassfoundation.org)

or call 360-675-3767x31

*Hosted by:*

DECEPTION PASS PARK  
FOUNDATION 

## Park Updates

### Fire Ban Status:

Currently, ALL fires are prohibited, including campfires and charcoal barbecues. Only propane or gas stoves are allowed. No charcoal!

Yes, Island and Skagit County both now allow recreational fires in campfire rings. State Parks are regulated by the Department of Natural Resources. They are saying they will not lift their ban until September 30. Sorry.

### Fix-it Day

Saturday, September 26, 9 a.m. - 2 p.m. At the Farmer's Market, 611 "R" Avenue, Anacortes

Reduce, Re-use, Repair and re-use again!

Got a broken appliance that you're hoping to repair? Or a lamp that needs attention? How about those two watches that need batteries? Broken or chipped items that need mending?

Bring it to Fix-It Day and we will see if we can work a little magic on your broken item. Running late? We will take, fix and return the next Fix-It Day.

Get your small household items repaired in return for a donation benefiting Deception Pass State Park.

### Lake Status:

Cranberry Lake is closed due to toxicity from blue-green algae (Anatoxin-a)

Pass Lake is currently open.

### Other Coming Park Events:

December 6: Deception Pass Dash Kayak Race, Bowman Bay

December 12, 13: Rainshadow Running 25k and 50k races at the park.

March, 2025: Deception Pass State Park's 100th birthday.

### Fishing and Crabbing

Although it has been slow this year, pink salmon fishing continues from the shores of Deception Pass, particularly at North Beach, but also at West Beach and Hoypus Point.

Some say that the recent rain will encourage salmon to head into the Pass and towards the Skagit River, so fish numbers may increase.

Crabbing comes to a close here on Labor Day, September 7.

Park Hours: 6:30 a.m. to dusk.

### 2015 State Parks Free Days:

September 26 – (Saturday) National Public Lands Day  
November 11 – (Wednesday) Veterans Day

Or, volunteer 24 hours in a calendar year and receive a free Discover Pass.

Or, buy a Discover Pass from us and all the parks in the state are free to you every day of the year! And that way, you are supporting your state parks directly.





## The Sounds of Silence

The past two weeks, the north end of Whidbey Island has been bombarded daily and nightly with the ear-splitting screams of war jets training for missions elsewhere on this lovely planet.

In the temporary lull of their assault on our senses, I heard at Cornet Bay the changing of the tide; I heard a leaf fall to the ground at Pass Lake; I heard a beaver slip under the water at Cranberry; I watched robins listening for – and hearing – the movement of earthworms underground.

We have lost the precious sound of quiet, just in our lifetime.

In this state, we have a world expert on the sounds and silences of nature. Gordon Hempton has been measuring noise for decades. There used to be 21 places in this state that he could count on having long periods of silence.

That is now down to 3.

<http://mentalfloss.com/article/63313/sounds-silence-capturing-disappearing-noise-nature>

Silence is an endangered species, says Gordon Hempton. He defines real quiet as presence — not an absence of sound, but an absence of noise. The Earth, as he knows it, is a "solar-powered jukebox." Quiet is a "think tank of the soul."

<http://www.dailygood.org/story/972/sounds-of-silence-gordon-hempton/>

"Silence is not the absence of something but the presence of everything. It lives here, profoundly, at One Square Inch in the Hoh Rain Forest. It is the presence of time, undisturbed. It can be felt within the chest. Silence nurtures our nature, our human nature, and lets us know who we are.

"Left with a more receptive mind and a more attuned ear, we become better listeners not only to nature but to each other. Silence can be carried like embers from a fire. Silence can be found, and silence can find you. Silence can be lost and also recovered. But silence cannot be imagined. To experience the soul-swelling wonder of silence, you must hear it."

Although this park does not have any place with true silence, there are a handful of places where I will get away to tone down the sounds of civilization.

Where, you ask? Naked Man Valley is the best, followed by the west side of Deception Island, Hoypus Point on the east side, the Dunes Trail, Hope and Kiket Islands, and the northwest side of Lighthouse Point.

Unless the jets are flying...



*This monthly update is sent to folks who have expressed an interest in keeping in touch with what is happening or in the planning stages at Deception Pass State Park.*

*We are grateful to have you welcome us into your inbox.*

*If you are not interested in receiving these monthly updates, please reply to this message and let me know. We have no intention of sending emails that you do not wish to receive.*

*If you wish to communicate at anytime with me or other park staff, please email, call, or visit us. This park is your park.*

## Jack Hartt

Park Manager  
Deception Pass State Park  
41020 State Route 20  
Oak Harbor, WA 98277  
360-675-3767 ext. 26  
[jack.hartt@parks.wa.gov](mailto:jack.hartt@parks.wa.gov)

### Deception Pass State Park Staff:

Rick Blank, Asst. Manager  
Jim Aggergaard, Ranger  
Darlene Clark, Sr. Park Aide  
Rick Colombo, Park Aide  
Doug DeYoung, Park Aide  
Todd Harris, Sr. Park Aide  
Jack Hartt, Park Manager  
Jeri Lancaster, Office Asst.  
Mark Lunz, Maintenance  
Carly Rhodes, Interp. Intern  
Bill Ruh, Sr. Park Aide  
Ben Shook, Ranger  
Jason Stapert, Ranger  
John Whittet, Ranger  
Marv Wold, Maintenance



## No Park Is An Island

Parks have been called "Islands of Hope", refuges for protecting our environment, our diverse cultural heritages, our adventurous spirits, and our sanity.

But parks are not islands, remote and untouched by the whirlwinds of living and change throughout the rest of the world. When we try to set aside something by itself, the more we find it hitched to everything else in the universe, as John Muir taught us.

Parks are intimately tied to everything else going on around us. Climate change is warming our park waters as it is the rest of the planet. Jet noise from the Navy practicing to help deter hate-filled ideologies ten thousand miles away still shatters our peace here at home. Deer wandering through my back yard may also wander through the yards of all my neighbors, and onto the highway as well. Seeds from invasive species, and the fruits of despair, do not stop at the park boundary.

Just as importantly, parks are a reflection of the communities around us, and a critical component of our shared values, cultures, and purposes.



All our parks together provide habitat strength, stability, open space, connectivity, accessible recreational opportunities, shoreline and water access, and spiritual abodes.

Deception Pass basks in the warmth of attention and love given by so many of our neighbors, friends, and community members. The thirteen thousand hours of volunteer service this past year attest to the involvement and care that I see from people of all ages and walks of life.

Parks are blessed by these diverse community engagements and the relationships with our communities and citizens around the state and the world.

My goal is that the gifts that this park gives back to our communities are worth the investment by so many of you in helping make this a better place for us all now, and for our future generations to come.

Thank you to everyone who cares about our parks, through the sharing of your time, love, finances, and ongoing involvement.

*This monthly update is sent to folks who have expressed an interest in keeping in touch with what is happening or in the planning stages at Deception Pass State Park.*

*We are grateful to have you welcome us into your inbox.*

*If you are not interested in receiving these monthly updates, please reply to this message and let me know. We have no intention of sending emails that you do not wish to receive.*

*If you wish to communicate at anytime with me or other park staff, please email, call, or visit us. This park is your park.*

*Jack Hartt*

**Park Manager**  
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- Todd Harris, Maintenance
- Jack Hartt, Park Manager
- Jeri Lancaster, Offic. Asst.
- Mark Lunz, Maintenance
- Montana Napier, Naturalist
- Bill Ruh, Sr. Park Aide
- Ben Shook, Ranger
- Jason Stapert, Ranger
- Bryce Watkinson, Ranger
- John Whittet, Ranger
- Marv Wold, Maintenance



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]
2. Organization/Affiliation homeowner - COER supporter
3. Address [REDACTED] Coupeville WA 98239
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

*This in my opinion was unhelpful and very one-sided - Navy has totally biased information. Come to my home when OLF in action - my life is unbearable NOW my water is toxic.*

*Why does the Navy protect us here and look after our health. Sound levels are killing people, animals*

Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

1) The touch/goes do influence pilot readiness and hence national readiness, but conducting FCLP operations at the OLF is not necessary. There are better places – one's without the human impacts/risks – sites that provide more effective training conditions that actually mimic the South China Sea and the Persian Gulf – sites safer for us and better for pilots. The DEIS dismissed those options with manufactured reasoning that does not comport with NEPA requirement. You must fix that please. 2) Growler noise levels, and especially the low-frequency components, are not safe for pregnant women. The Navy will not allow pregnant women to work in noise areas far less than the noise AC residents experience. The DEIS must address how the proposed actions will impact pregnant women, and how the Navy will eliminate the attendant risks to her and her family. 3) The AC noise levels are many multiples over the military threshold for designating what they term a “hazardous noise zones.” Anyone working in such areas is required to undergo routine health monitoring and wear high-tech hearing protection. The DEIS must address how the proposed actions will impact civilians, and how similar safeguards for civilians will be provided. 4) OLF operations violate FAA elevation rules and, as backed up by the Supreme Court, represent an illegal taking of airspace over many homes and properties. Each of us owns the 500 feet over the highest point on our house, and we can do anything we want with that space even if it were to interfere with aircraft. The DEIS must confront this illegal taking and address the remedy. 5) Then there is the impact on our economy and property values as revealed in this just published economic report: <http://westcoastactionalliance.org/navys...> The examination of options must consider cost/benefits for both on-Whidbey and off-Whidbey FCLP training sites.

- 1.a. Thank You
- 12.b. Invisible Costs
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.d. Arrivals and Departures
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

January 6, 2017

EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

Re: Public Comment Against Draft EIS for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island

Dear Sir/Madam:

I am a resident of Clallam County Washington. I am extremely concerned about the effects of noise generated by the Electronic Attack Squadron (VAQ) 132 over the Olympic National Park and surrounding areas including populated areas. Every effort should be made to mitigate the noise to prevent injury to habitat for humans and other animals. I understand that there is no need for the pilots to be at an elevation (other than for landing and take-off) lower than ten-thousand feet, but pilots have been well below this elevation numerous times as evidenced by the flight records kept by the Whidbey NAS and by many complaints received by NAS Whidbey. Can you find a way to assure citizens that flights will not be lower than the ten-thousand foot level?

I also understand that a similar aircraft practices in Mountain Home Idaho AFB, home of the 366 Airforce wing. In fact, the 390th Electronic Combat Squadron, which I believe includes the Electronic Attack Squadron, located at Naval Air Station Whidbey Island, Wash., is assigned to the 366th Operations Group out of Mountain Home AFB. Is the duplication of such training facilities necessary?

I am sure you are aware of the December 16, 2016 incident at NAS Whidbey. The US Navy (USN) has grounded its fleet of Boeing F/A-18E/F Super Hornet and EA-18G Growler combat aircraft while it investigates the cause of a ground incident on 16 December that injured two flight-crew.

The incident at Naval Air Station (NAS) Whidbey Island in Washington state saw an EA-18G Growler from Electronic Attack Squadron (VAQ) 132 experience an unspecified "on-deck emergency" that required both crew members to be airlifted to hospital, a USN statement said.

The Olympic National Park is a National Heritage site, and citizens on the Olympic Peninsula deserve reasonable noise mitigation. I strongly urge appropriate, affective noise mitigation and high altitude only flights which the current draft EIS does not adequately address or resolve.

Sincerely,

[Redacted signature]

Name: [Redacted]

Address: [Redacted] *Port Angeles WA 98302*

cc: Hon. Derek Kilmer, U.S. Congressman, 6<sup>th</sup> CD, WA State

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.a. Purpose and Need
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.l. Points of Interest
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children



lopez island, WA 98261

We have owned our land on the south end of Lopez Island for 18 years. Initially we were shocked by the noise of the Navy Prowler jets. Looking back, this noise and disturbance as insignificant compared to the Growler jets the Navy are currently flying in both intensity and frequency. Since the Growlers have been in use there have been many, many occasions where I am working outside, with ear protection, and still hear, feel and see the Growlers flying over our place. There is no escaping the noise and vibration of these planes. The noise rattles your house and body. I have recorded 119 dB levels at my house. I have heard that the Navy knows these planes (their noise level) are not good for human health. The extremely sad and disgusting thing is the Navy knows that this is an issue but we are considered collateral damage. Yet they persist under the guise of having produced models that say there is very low impact. The models have no calibration or ground-truthed data points in the San Juan Islands. They do not have any idea what the decibel levels we, humans, are exposed to. Not to mention the wildlife who are affected daily as well. Studies have shown that loud noise affects the behavior of birds. And while I am swimming in Hughes Bay, Lopez Island I am frequently startled by jets flying over. I am certain that if they studied marine mammal behavior they would discover detrimental effects on these beings as well. But this is unlikely, because they do not seem to care. In the past 3 years I have experienced; tinnitus, hearing loss, increased stress levels and sleep disturbances. The affects of the Growler noise pollution on me personally are increased heart rate, a feeling of flight or fight, and impending doom. This is not good for anybody. In addition to the health, mental and physical effects of this Growler noise pollution on humans, we have seen the economical impacts as well. Our property value has gone down and I am told by real estate people that they are now revealing to clients the level of noise pollution that we are exposed to. The property values will, no doubt, continue to go down. This is in a place where people flock to for the beauty and would love to live but now will not want to due to this horrid noise. Visitors are shocked by the noise when they come to our house. Many of them have lived next to airports or Air Force bases and say that this noise is worse than anything they have ever experienced. I too have found that when I visit Seattle or other large cities around the world, even Nairobi, Kenya, that they are much more peaceful than our home on Lopez Island, WA. Do not increase the number of Growler jets at Whidbey NAS and please find a way to decrease the current noise they produce. We should not have to feel like we live in a war zone. We are truly suffering over here as a consequence of these jets.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.c. Noise Disclosure

lopez island, WA 98261

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. ACTION: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model. 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. ACTION: Noise levels should only be averaged over active flying days. 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive. ACTION: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe." 6. The Draft includes some independent noise measurements and ignores others. ACTION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument. ACTION: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA. 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing. ACTION: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training. 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation areas that are being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI. ACTION: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties. 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment. ACTION: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision. 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion." ACTION: Supplement the EIS to address deficiencies identified in

- 1.a. Thank You
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

comments and offer further opportunity for public comment before the Final EIS is prepared. 12. Personal statement from myself as a tax payer and land-owner on Lopez Island, WA.: We have owned our land on the south end of Lopez Island for 18 years. Initially we were shocked by the noise of the Navy Prowler jets. Looking back, this noise and disturbance as insignificant compared to the Growler jets the Navy are currently flying in both intensity and frequency. Since the Growlers have been in use there have been many, many occasions where I am working outside, with ear protection, and still hear, feel and see the Growlers flying over our place. There is no escaping the noise and vibration of these planes. The noise rattles your house and body. I have recorded 119 dB levels at my house. I have heard that the Navy knows these planes (their noise level) are not good for human health. The extremely sad and disgusting thing is the Navy knows that this is an issue but we are considered collateral damage. Yet they persist under the guise of having produced models that say there is very low impact. The models have no calibration or ground-truthed data points in the San Juan Islands. They do not have any idea what the decibel levels we, humans, are exposed to. Not to mention the wildlife who are affected daily as well. Studies have shown that loud noise affects the behavior of birds. And while I am swimming in Hughes Bay, Lopez Island I am frequently startled by jets flying over. I am certain that if they studied marine mammal behavior they would discover detrimental effects on these beings as well. But this is unlikely, because they do not seem to care. In the past 3 years I have experienced; tinnitus, hearing loss, increased stress levels and sleep disturbances. The affects of the Growler noise pollution on me personally are increased heart rate, a feeling of flight or fight, and impending doom. This is not good for anybody. In addition to the health, mental and physical effects of this Growler noise pollution on humans, we have seen the economical impacts as well. Our property value has gone down and I am told by real estate people that they are now revealing to clients the level of noise pollution that we are exposed to. The property values will, no doubt, continue to go down. This is in a place where people flock to for the beauty and would love to live but now will not want to due to this horrid noise. Visitors are shocked by the noise when they come to our house. Many of them have lived next to airports or Air Force bases and say that this noise is worse than anything they have ever experienced. I too have found that when I visit Seattle or other large cities around the world, even Nairobi, Kenya, that they are much more peaceful than our home on Lopez Island, WA. Do not increase the number of Growler jets at Whidbey NAS and please find a way to decrease the current noise they produce. We should not have to feel like we live in a war zone. We are truly suffering over here as a consequence of these jets.

- 1.a. Thank You
- 3.a. Aircraft Operations

Oak Harbor, WA 98277

As a 4,000+ hr private pilot, I have questions about the flight routes and take off and landing patterns at Ault Field. I am unsure if this is the correct forum for these questions as they are not directly related to the EIS. Anyway, we all know that any noise can be disrupting to people. My concern is why low level flights, those under 5,000 msl for example, take place over populated areas of Whidbey Island? The location of NAS Whidbey seems perfect to have most flight operations taking place over water. Taking winds in to consideration for TO & LDGs, only the agricultural area by Dugulla Bay (and is not populated) needs to be transited from being over water. + I would also question why departures aren't made by climbing out over water to an altitude over 5,000 msl and a corresponding reduction of throttle would not only lessen the noise footprint but would save a ton of jet-A! It seems to me that there is sufficient opportunity over water or over sparsely populated areas in eastern WA that would be available for high power setting operations. I have flown into and around noise sensitive areas for many years and altering routes to avoid sensitive areas (populated areas), but lower power settings were asked for when PRACTICAL. Not "dragging" a plane in with a high delta angle and high power is merely a different technique that creates noise. Take offs require high power settings but a high angle of departure OVER WATER to a sufficient altitude before turning over populated areas seems doable. I realize that flight operations at OLF is mission specific and therefore has less flexibility, so be it. Ault Field has plenty of length on extended runway headings but the base and downwind patterns could be modified to lessen flight impact on the area. You have a thankless job trying to keep various motivated people happy. I, for one, love aviation, all kinds and ALWAYS look up when any kind of plane flies over. I wish you well and appreciate your consideration or explanations for my comments. To sum up things, LET'M Bounce!! Sincerely, [REDACTED]

OAK HARBOR, WA 98277

MY BACKGROUND: I WAS THE NAVY'S TEST PILOT (AT PAX RIVER) FOR THE PROWLER. MY FAMILY AND I MOVED TO WHIDBEY IN LATE 1970 AND BUILT A HOUSE IN DUGUALLA BAY (UNDER THE APPROACH PATH TO THE SW RUNWAY AT AULT FIELD). EIGHT YEARS LATER WE MOVED AWAY ON NAVY ORDERS AND ULTIMATELY SOLD THE HOUSE. UPON RETIRING FROM A SECOND CAREER, WE MOVED BACK TO WHIDBEY AND PURCHASED ANOTHER HOUSE IN DUGUALLA BAY..WITH THE FULL KNOWLEDGE THAT WE WOULD BE LIVING UNDER THE APPROACH FLIGHT PATH FOR THE RUNWAY IN USE THE MAJORITY OF THE TIME, BASED ON PREVAILING WINDS. COMMENTS: (1) OLF COUPEVILLE PROVIDES THE ONLY REALISTIC ENVIRONMENT FOR NIGHT CARRIER LANDING PRACTICE, AND AS SUCH, SHOULD BE UTILIZED AS MUCH AS POSSIBLE. AS NOTED IN THE EIS, IF MOST FCLPS WERE CONDUCTED AT AULT FIELD, ASIDE FROM BEING UNREALISTIC TRAINING (TOO MANY LIGHTS IN THE AREA), IT WOULD CAUSE CONFLICTS WITH OTHER AIRCRAFT LANDING AT AULT FIELD. HENCE, I AM STRONGLY IN SUPPORT OF USING THE OPTION OF 80% FCLPS AT OLF, 20% AT AULT FIELD (ESPECIALLY AT NIGHT). THE ANTICIPATED INCREASE IN THE NUMBER OF GROWLERS WILL OBVIOUSLY INCREASE THE NUMBER OF FCLPS, BUT NOT MORE THAN IN THE PAST WHEN THERE WAS A HIGHER OPS TEMPO (VIET NAM, THEN IRAQ) AND THERE WERE NO DESIGNATED EXPEDITIONARY SQUADRONS (2) ENGINE NOISE FROM GROWLERS IS NOT MUCH DIFFERENT THAN PROWLER NOISE, EXCEPT WHEN A GROWLER USES AFTERBURNER (AND THEY VERY SELDOM USE A/B UNLESS IN AN EMERGENCY SITUATION OR SIMULATING ONE). (3) OPPONENTS OF THE USE OF OLF FOR FCLPS CITE UNSUBSTANTIATED CLAIMS OF NOISE AFFECTING THE HEALTH OF RESIDENTS AND THEIR ANIMALS, BUT IN THE SIXTY SOME YEARS SINCE JETS HAVE BEEN USING OLF AND AULT FIELD FOR FCLPS, NO ONE HAS HAD THEIR HEALTH IMPACTED BY THE NOISE. CHILDREN GREW UP PERFECTLY NORMAL DESPITE OCCASIONAL EXPOSURE TO FCLP NOISE. A VERY GOOD FRIEND OF OURS WHO RAISES SHIRE DRAFT HORSES LIVES ADJACENT TO THE OLF AND SAYS HER DOZEN OR SO HORSES ARE TOTALLY INDIFFERENT TO ANY NOISE CREATED BY THE GROWLERS "BOUNCING" ON THE OLF. (4) OPPONENTS ALSO THINK THE NAVY SHOULD MOVE SOME (OR ALL) OF THE GROWLERS TO OTHER BASES, BUT THEY DON'T (WANT TO) UNDERSTAND THAT THE COST OF MAINTENANCE AND TRAINING FACILITIES IS SO ASTRONOMICAL AS TO PRECLUDE ANYTHING BUT SINGLE-SITING THEM HERE AT WHIDBEY. ALSO, THE (LESS DENSE POPULATION) ENVIRONMENT HERE IN THE NORTHWEST IS IDEAL FOR FLIGHT OPERATIONS. (THAT INCLUDES THE OLYMPIC MOUNTAINS, WHERE LOW-POWERED MOBILE TRANSMITTERS CAN OPERATE AND PROVIDE REALISTIC MISSION TRAINING.)

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative
- 3.a. Aircraft Operations
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

1.a. Thank You

Coupeville, WA 98329

We are supporting the Navy

Portland, OR 97236

Please do not use the Olympic Peninsula for training grounds. I often vacation there, and this would completely destroy my vacations. The harm to wildlife there would be monumental. The waste of gas would be preposterous. Don't do it! Find less abusive ways to train your people, and leave the Peninsula alone. Thank you.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 17.a. Hazardous Materials and Waste Impacts
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.k. Range of Alternatives
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area

Coupeville, WA 98239

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.



Coupeville, WA 98239

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

Coupeville, WA 98239

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

Coupeville, WA 98239

1.a. Thank You  
7.c. Noise Disclosure

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Coupeville, WA 98239

The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Coupeville, WA 98239

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment.



Coupeville, WA 98239

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

Coupeville, WA 98239

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss

Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP)

Seattle, WA 98115

The noise and jet traffic associated with the base at Oak Harbor is already ridiculous. Having camped at Deception Pass several months ago, I was outraged that this flying night and day is allowed. It was so loud that it was difficult to sleep. I am also startled and concerned to hear that contaminants associated with these aircraft have entered Whidbey Island/ aquifer. Increasing flight traffic to the area is unacceptable. The Navy should find an alternate location for the remainder of the fleet.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.n. Alternatives Considered But Eliminated
- 4.p. Sleep Disturbance
- 7.i. Deception Pass State Park and Other State Parks



## Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation citizen

3. Address [REDACTED] Coupeville, 98239

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

I live in the flight path for OLF. They seem to turn at my house to fly over Keystone Lagoon to OLF. I am very concerned about my health & hearing. I have several assorted ear covers, alternating because they hurt as they squeeze. My ears hurt inside & out. My blood pressure elevates. I cry. At age 65 I joined the Force Corps - served in Ukraine & Indonesia. I came back & find a place where I can live w/ my reverse culture shock -- materialism, congestion, noise & values. I found Whidbey. Now you are ruining my life.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 3.a. Aircraft Operations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects



Olympia , WA 98502

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Extend the comment period for the proposal. We need additional time to make comments, especially during the holiday season.

Port Townsend, WA 98368

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

I am requesting a 45-day timeline extensions for comments on this issue.

Port Ludlow, WA 98365

- 1.a. Thank You
- 2.a. Purpose and Need

The Navy does not need more Growlers. Follow the money to see why the Navy has been picked to receive these planes.

Coupeville, WA 98239

Here are some of the key points we're challenging: 1. The Navy's calculation of decibels: The Navy uses a computer simulation to determine the average daily decibel level (which includes non-flight time), and then spreads that over the year. They don't measure the actual noise generated on training days. Their finding: 90 dBA. The National Park Service, in a federally funded study, measured actual dBA as high as 117 dBA. We believe the Navy has minimized the impact of actual flights over our homes and land. 2. Hearing Loss: Even using their measurements, the Navy states that between 1,658 and 1,803 residents potentially risk hearing loss, directly due to aircraft noise exposure. 3. Pitting Oak Harbor against Coupeville: All the scenarios in the EIS assume an increase in Growler training, giving citizens the options of maximum disruption to either Oak Harbor or Coupeville. The report presents no option of no harm to any of our citizens. 4. Frequency: Flight operations will increase from 6100 to 35,100, a 475% increase. 5. Impact on farms: 1183 additional agricultural acres, many of which raise livestock, will be significantly affected by sound levels 6. Impact on citizens and animals: 2243 additional residential acres will be significantly affected by excessive sound levels 7. Potential Crashes: Three "Accident Potential Zones" (where crashes may occur) extend up to 5,000 feet from ends of the Outlying Field plus a 3,000-foot wide track located 1500 feet on either side of fields used for carrier landing practice, threatening hundreds of households with potential crashes and significant loss of property values, giving residents a choice between harm to their health or finances. 8. Toxins: The Navy's use of two perfluoroalkyl substances (PFAS); perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA), both of which are used by the DoD for aviation fire suppression, may have entered the single north island aquifer, making our water unsafe to drink or to use for irrigation. Wells are being tested now. One has already tested 5 times the EPA safe limits. With 475% increase in flights, we are concerned about an increase in toxicity. As the Sioux say, water is life and we can't afford to lose our drinking water in our farmland or the historic city of Coupeville. 9. Parks: Noise impacting area Parks (town, state, federal) will increase by 91%; 10. Economy: With nearly 200 flight operations per day around Coupeville, our fragile, essential local economy will be threatened, including tourism, hospital quality of operation, small businesses and agriculture. 11. Our Heritage: Coupeville is the second oldest city in Washington State. It is the County Seat. It is part of the unique Ebey's Landing National Historical Reserve established by Congress in 1978 as the first and one of only two National Historical Reserves in the nation. 12. Coupeville receives very little economic benefit from the presence of the Navy on Whidbey Island -- they shop primarily in Oak Harbor, their children attend Oak Harbor schools, their housing is mostly around Oak Harbor, the support they enjoy from citizens is mostly from Oak Harbor residents who enjoy the economic benefits. Therefore, it is Oak Harbor that should have the vast majority of flight operations.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.e. Agriculture Analysis
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.q. Potential Hearing Loss
- 5.a. Accident Potential Zones
- 7.a. Regional Land Use and Community Character
- 7.e. Impacts to Recreation from Noise/Operations
- 8.e. Outlying Landing Field Coupeville and Coupeville History

Coupeville, WA 98239

Accident Potential The Navy wishes to utilize an existing OLF field for their six-fold expansion of Growler operations and, while commendable from an economic perspective, clearly their use of the Coupeville OLF has far exceeded what the facility was designed to handle. Their carrier-landing practices are taking place in a crowded occupied area where the impact of a crash are amplified far beyond those of a crash in an open desert area. Economic, life and limb, environment, health and infrastructure damage becomes a major part of the risk equation. Risks that might be tolerated in an uninhabited setting become intolerable within a civilian-populated setting. No crash-risk analysis is included in the DEIS, but it cannot be ignored. The Navy's DEIS does not address Accident Potential Zones (APZs) although annual flight operations exceeding 5000 require the establishment of these zones. Options being considered by the Navy would subject properties from Engle Road and western Coupeville east to Saratoga Passage and from Penn Cove on the north to Puget Sound to inclusion in an APZ 1 or 2. Property values will further plummet. Even worse, all those APZ properties and many more beyond are in a Noise Zone 2 area, within which Island County may deny residential development. The Navy has already compromised safe practices at the OLF facility. The runway is 25% shorter than Navy-required Growler runway length. Further, the Navy requires 30,000 open acres surrounding the runway – there is currently barely 2% of that amount. Residences, a bus fuel-depot, businesses, county facilities, the lone highway through central Whidbey, and the city of Coupeville are under runway approach paths and many are within what should be uninhabited accident-risk zones at runway ends. Atmospheric conditions increase the likelihood of accidents: 1. Frequent wind shifts, create dangerous tail-winds for allowed Flight Carrier Landing Practice (FCLP). In actual carrier landings, tailwinds are avoided. Yet civilian spectators have witnessed FCLPs with tailwinds exceeding strict tailwind-speed regulations. 2. Amplified risks exist from Whidbey's extensive bird life, potentially endangering very low-level jets over water, and near forest and hedge areas. 3. Frequent fog, rain, and shifting winds would, with 35,000 flight operations planned per year, force the Navy to fly under edgy conditions. There would undoubtedly be desperately needed, time-sensitive training-flight allocations occasioned by the crowded calendar. (Calculations from the DEIS would require half the days of the year –183—for required flights.) Decreasing the safety envelope to a bare minimum would be needed to fit flights in, raising accident risk. 4. A vast "density altitude" difference exists between OLF (d.a. of 337) and typical dry Middle East sortie locations (Persian Gulf d.a. of 2182, for example.) While not endangering pilots in OLF training, it does endanger them in the war theater: it increases the risk of hitting a Persian Gulf Carrier deck too hard or not soon enough by misjudging the lift of the air that is vastly different from that in their OLF training. Other circumstance contributing to risk: 1. Night flights with tired pilots. 2. The troubling rise in the number of breathing and pressurization problems in the FA-18G and its close relatives, the FA-18E/F. Pilots rate the Growler's dependable oxygen their most pressing concern. 3. Pilots are trainees. They are learning new, dangerous maneuvers in a crowded venue, automatically increasing accident risk above routine flights done by seasoned pilots. 4. The Growlers are part of a family of similar planes that have a significant accident rate, despite the

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

“well-documented and established safety record” claimed in the DEIS – these planes have crashed!

Coupeville, WA 98239

Actual noise measurements have not been made. The Navy has relied on outdated noise modeling and inappropriate noise averaging to try to make a case for insignificant noise impact. Averaging noise levels over 24 hours, including hours of silence, gives a distorted picture of the real noise impact. A 24-hour average decibel level may be only 65-75, but when the jets are actually passing overhead, noise levels far exceeds 100 decibels, causing irreparable harm. It's not surprising that among Navy personnel the most common health problem is hearing loss. An economic study conducted by economist Michael Shuman, an expert on local economies, found that health costs alone exceed \$2M/year. Further, because of the intrusive nature of the training, property values have already been depressed by nearly \$10M. With a six-fold increase in operations planned by the Navy, our property values will be decimated, along with our quality of life.

1.a. Thank You

12.b. Invisible Costs

12.j. Property Values

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

4.d. Day-Night Average Sound Level Metric

4.q. Potential Hearing Loss

Coupeville, WA 98239

The DEIS states that increase Growler operations will cause “between 45 and 55 disruptions PER HOUR in the Coupeville schools”. Children may experience cognitive damage due to increased frequency and level of noise. Outdoor activities (recess, sporting events, etc.) will have to be curtailed.

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.j. Impacts on Outdoor Sports



Coupeville, WA 98239

ECONOMIC LOSSES and TAX DEFICITS: The Naval Air Station does not provide its own school for Navy families. Children attend local schools, but the Navy pays no local taxes for schools – Island county taxpayers bear the cost. Locals have always believed that the air station is the backbone of the local economy. But considering school costs and the loss of sales tax revenues because Navy families as well as retired military people shop on base, the county has about a \$5.7 million shortfall each year that is attributable directly to the presence of the Naval Air Station. And that's before considering the 1000 new families expected with an expansion of the Growler fleet to Whidbey Island. Whidbey's economy is mostly dependent on tourism, particularly Coupeville and central Whidbey. With a six-fold increase in the number of flight operations sought by the Navy, requiring training flights at OLF half the days of the year, Coupeville's local economy will be seriously jeopardized. Local B&B operators have indicated they will need to close their business if Growler flights are expanded to 35,000 per year. And already local farmers, the other bedrock of the local economy, are facing the prospect of closing their farms because the noise adversely affects their animals and the people who have to work their farms. Oak Harbor, home of NAS Whidbey, considers the air station a key to their economy, unlike Coupeville. Navy personnel send their children to Oak Harbor schools, shop in Oak Harbor, frequent Oak Harbor restaurants and bars. In general, Oak Harbor and North Whidbey leaders and business people support whatever the Navy wants to do. And yet, if the Navy proceeds with using Coupeville OLF for 80% of future training operations, as they prefer, it is the Coupeville economy, culture, tourism, agriculture and quality of life that will suffer without receiving a commensurate economic benefit. In fact, Central Whidbey will bear a disproportional burden of the cost of expanded operations. Since Oak Harbor reaps the majority of whatever benefits the Navy provides it, it only seems fair that 80% of the flight operations be performed out of Ault Field rather than Coupeville OLF.

- 1.a. Thank You
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.m. Education Impacts
- 12.p. Local Differences in Economy

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Coupeville, WA 98239

ALTERNATE SITES The only alternatives considered in the DEIS call for 100% of Growler training to be conducted on Whidbey Island. But there is a growing list of sites which could be used for some Growler training which should be considered in the final EIS to mitigate the significant impact of the proposed action, especially at the OLF. Aircraft can be sited at NASWI, as called for in the proposed action, but flown at any number of alternative locations. The DEIS considers both detachment training and regional airfields as alternatives but dismisses these without analysis. Detachment training from NASWI is already occurring, or has occurred, at some of these bases. The following optional sites requiring analysis. 1. Detachment training alternatives: NAS Lemoore, CA NAF El Centro, CA NAWS China Lake, CA NAS Jacksonville, FL NAS Oceana, VA NCAS Cherry Point, NC NAS Meridian, AL NAS Fallon, NV Mountain Home AFB, ID NAS Kingsville, TX NAS Corpus Christi, TX 2. Regional Airfield options for FCLP practice: Joint Base Lewis-McCord, Tacoma, WA Grey Army Airfield, Tacoma, WA Grant County (Larsen AFB), Moses Lake, WA Snohomish County (Paine Field), Everett, WA Bremerton National, Bremerton, WA Skagit Regional, Burlington, WA Bellingham International, Bellingham, WA All of the above, other than Grant County, have been disqualified using selected criteria in DEIA Appendix, Section H, for one of more reasons. HOWEVER, using the same DEIS criteria Ault Field would have also been disqualified for FCLPs, having failed criteria nos. 6 and 8.

Coupeville, WA 98239

SINGLE-SITING OF GROWLERS at NAS Whidbey Island: The Navy is proposing an unprecedented and strategically questionable concentration of their Electronic Warfare jets in one location. The Growler is essentially the only electronic warfare jet in action in any of the US military forces. It is the only Navy jet that is single-sited; all others have at least two bases. Having 96% of the military's EW jets located on a coastal island served by a bridge and two ferries, in a post 9/11 world seems terribly unwise. Why make nearly the entire fleet of EW jets vulnerable to terrorist or any enemy attack? The only bridge to and from the island (Deception Pass bridge) is part of the Department of Defense's Strategic Highway Network and is a Federal Highway Administration "Critical Bridge" because of its span length, it's being a major evacuation route, and because it carries water from the mainland, supplying not only Oak Harbor but NAS Whidbey as well. An earthquake or terrorist attack could damage the bridge, limiting or preventing access for months. Over half of the Army, USMC, Special Forces, and tactical AF units are located on the East Coast. Siting Navy Growlers on the East or Gulf Coast would protect against attacks on Gulf Coast tankers.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

Coupeville, WA 98239

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects

According to the DEIS, classrooms at the Oak Harbor High School and Crescent Harbor Elementary School are already being interrupted 4-5 times per hour for multiple school-time hours every week, and the rate and intensity of these interruptions will grow as the Growler program expands.<sup>35</sup> Teaching with significant interruptions every 10-12 minutes is exceedingly difficult. What are the costs of lost school time? Lost education? Student well being?

Coupeville, WA 98239

1.a. Thank You

5.a. Accident Potential Zones

5.d. Environmental Health Risks and Safety Risks to Children

The DEIS inadequately reveals the potential cost of a catastrophic accident. The Navy's policy is generally not to conduct training flights in populated areas like Whidbey Island, because the area underneath is an "Accident Potential Zone" (APZ). As noted, the Navy may recommend a prohibition on additional development on these properties after the EIS is finalized. But even with the existing level of development, the dangers of a major accident are potentially huge. A plane accidentally crashing into a public school, a hospital, or a fuel storage facility, for example, could conceivably lead to hundreds of deaths and hundreds of millions of dollars of liability. The Growlers, moreover, have a significant rate of accidents and mishaps that make these worries not just abstract. See Robert Wilbur, Maryon Attwood, Neal Sims, and Mark Harmon, "Outlying Field Coupeville: Its Time Has Passed," monograph, October 2016, pp. 40-44, 79-84. The authors make the points that military jets are 67 times more likely to crash than passenger jets, and that the F-18 frame (which the Growler uses) has had an accident rate 5.5 times greater than the predecessor Prowler. The report contains appendices with comprehensive lists of worrisome Prowler and Growler mishaps.

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A 2013 report by the Island County Economic Development Council lauds the Naval Air Station Whidbey Island in Washington State as “four times the size of the next nearest employer” in the region. It argues that the Navy’s contributions to the local economy include \$726 million in annual payroll, \$44 million in retirement and disability payments, and \$18 million in health care payments. Another study for the Washington Economic Development Commission found that in FY 2009 the Navy gave Island County companies \$130 million in contracts. All these studies, however, are outdated and incomplete. They highlight the benefits of Naval operations but say nothing about the costs. There are myriad costs that thus far have been invisible for public scrutiny and action, AND are not shared by the Navy in the DEIS. Among the biggest:

- Public Costs – Navy personnel and their families use the same services as other businesses on Island County, but if they live or shop on the base they are exempt from local taxation. That means that other residents wind up underwriting a significant part of the Navy’s presence. For example, the County is losing an estimated \$5.7 million per year in sales and property taxes that it would otherwise collect from employees of an equivalently sized private industry.
- Opportunity Costs – Compared to private sector jobs, Navy jobs yield relatively small economic impact. The conversion of existing Navy jobs to civilian jobs would create 3,909 additional jobs (beyond the converted jobs), expand the economy by \$503 million, and generate \$153 million more in taxes (mostly to state and local government). The loss of military pay and benefits would bring down net labor income by \$78 million, but this is more than compensated for through expanded proprietor income, rents, and tax revenues.
- External Costs – The Naval Air Station’s largest program—training pilots to fly “Growler” aircraft—has exposed more than 11,000 residents to harmful levels of noise. An economic assessment model used to assess every high-noise project in the United Kingdom suggests that the health costs to Island County residents are currently \$2.8 million per year, and will grow to \$3.3 million if the Growler program expands as planned. Additionally, the program has depressed property values by \$9.8 million thus far, and this damage will almost certainly grow as that program expands as planned. This side of the cost/benefit equation has been ignored in the DEIS. The Navy needs to be honest and upfront about all costs of their operations in Island County, rather than just revealing those that benefit supporting their proposal for expansion. This information is being disseminated to Island County and state and federal representatives, so it behooves the Navy to be forthright and honest.

- 1.a. Thank You
- 12.b. Invisible Costs
- 12.c. Socioeconomic Impacts
- 12.j. Property Values
- 12.o. Cost-Benefit Analysis

Coupeville, WA 98239

1. The risk of water contamination to the sole-source aquifer in central Whidbey Island surrounding OLF Coupeville is not adequately addressed in the DEIS. The following should be evaluated: • Risk and effects of a Growler crash and of the aqueous film forming foam that will be used for firefighting. • The susceptibility of geology and soils in the potential aircraft accident zones surrounding the OLF to infiltration of pollutants into the ground water. • No alternative water source for Town of Coupeville and surrounding community. • Viability, cost, and impact of remediation of groundwater pollutants and of providing alternative drinking water source. • The full short and long-term impacts, including environmental, cultural, & financial. 2. Noise modeling used in DEIS is not appropriate for and representative of noise made by Growlers. • DoD's Strategic Environmental Research and Development Program (SERDP) found NOISEMAP ver 7.2 to be outdated and possibly not able to provide "legally defensible aircraft noise assessments of current and future aircraft operations". The modeling program was developed to assess civilian airport noise. The noise evaluation model used in the EIS should be appropriate to evaluate Growler noise on the surrounding community. • The Naval Research Advisory Committee has acknowledged that variations in noise from tactical aircraft measurement standards are not addressed in standards for commercial aircraft, and that there are no standards for acquiring near-field aircraft noise data. The EIS evaluation should account for variations in noise measured from Growlers compared to commercial aircraft. • Noise averaging (Ldn) is inappropriate for Growler FCLP flights at OLF Coupeville, which occur sporadically. Studies by Borskya and Stephens show that maximum dBA readings are better indicators of community annoyance than Ldn. Generally frequent maximum sounds of 70 dBA or greater correlate in a linear fashion with community annoyance. The Coupeville community regularly experiences maximum noise exceeding 90 dBA, often exceeding 100 dBA, near and around the OLF flight path. The EIS should show maximum noise contours based on this metric. a) Borsky, PN: Integration of Multiple Aircraft Noise Exposure Over time by Residents Living Near US Air Force Bases, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1049-1060, 1983. b) Stephens, DG, Powell, CA: Human Response to Aircraft and Other Noise Events, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1061-1072, 1983. • The noise model and DEIS doesn't sufficiently assess the physical and mental harm, annoyance, disturbance to life and business, childhood learning, economy, tourism from noise. • Actual noise measurements have not been made by the Navy. Actual peak noise measurements should be made for the EIS, at several more POI's than identified in the DEIS. Individual sound measurements made by the National Park Service and others in the Central Whidbey community show noise levels far in excess of that predicted by DEIS modeling. • OSHA maximum noise exposure limits are 110 dB for 30 min per day, or 115 dB for 15 min per day (slow response). Growler operations at the OLF have been measured exceeding these sound levels at several locations, including my home and adjacent business, and at Rhododendron Park. Thus, the proposed action may exceed OSHA guidelines. The EIS should evaluate noise exposure based on OSHA guidelines, and state that OSHA noise exposure limits may be exceeded. • Washington State law

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 10.b. Biological Resources Impacts
- 11.a. Groundwater
- 11.b. Floodplains and Wetlands
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 14.d. Bridges and Ferries
- 16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 3.a. Aircraft Operations
- 3.j. Flight Simulators
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 6.f. Fuel Dumping
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

(WAC 296-817-20025) requires that employers in the State post warning signs in areas where noise levels will exceed 115 dB. The EIS should state that the Navy will make public notice, and request local jurisdictions to post warning signs, in public areas where noise levels exceed 115 dB. • Submitted separately 2/16/17, via website A-weighted sound measurements (dBA) are used in the noise analysis of the DEIS, which emphasizes the 1,000 to 4,000 Hz range (DEIS at p. A-142). However, the Growler emits substantial low-frequency sound, not reported by dBA. See Environmental Assessment for the Expeditionary Transition of EA-6B Prowler Squadrons to EA-18G Growler at Naval Air Station Whidbey Island, Oak Harbor, Washington, Final, October 2012 (the "2012 EA"), Department of the Navy, pages 38-39, Wyle report WR 10-22. As stated therein, "NASWI has received complaints of building rattle/vibration due to Growler events . . . . With its increased low-frequency content, the Growler takeoff events have higher potential to cause noise-induced vibration." Frequency profiles, shown on page 39 of that report, indicate substantial sound levels at frequencies below 100 Hz. dBA sound levels are, therefore, an incomplete measurement of Growler noise during FCLP operations, which leads to underestimating perceived sound levels and effects on people and property. The final EIS should clearly convey the lack of correlation between A-weighted measurements and the Growler sound spectrum, or should adopt a different, or additional, measurement standard. • The EIS should fully discuss the 2016 National Park Service (NPS) sound monitoring report in Ebey's Landing National Historic Reserve (ELNHR), as compared to the Day-Night Average Sound Level modeling method used (DEIS, pg 1-23). The actual sound measurements made in the NPS report suggest that the noise predicted by the modeling used in the DEIS could be dramatically underestimated. 3. Alternatives to increasing Growler operations at the Coupeville OLF should be fully addressed in the EIS. The discussion should include consideration of the following: • The "No Action" alternative in the DEIS was dismissed as not meeting the Navy's mission objectives, without a full and objective evaluation of alternatives. This is in violation of NEPA requirements. By not considering viable alternatives that could meet the Navy's mission without increasing operations at OLF Coupeville the DEIS appears to justify a predetermined decision. • Other landing strips in the region were dismissed as not viable for reasons including not meeting Navy safety standards for OLF's. This evaluation neglected the fact that OLF Coupeville, itself, does not meet Navy OLF standards. • Detachment training options, at other military air stations that meet standards for FCLP training. Such detachment training is presently being conducted for squadrons from NASWI. 4. Growler noise mitigation and abatement methods, operations and techniques should be thoroughly considered in the EIS. The DEIS discusses aircrew compliance and performance of policy, procedures, course rules, "good common sense", and "prudent airmanship techniques" (pg 3-30) as established methods to minimize noise impacts. Additionally, "NAS Whidbey Island has historically worked with elected officials from surrounding communities to best minimize impacts where practicable, including not flying at the OLF on weekends and minimizing flight activity during major school testing dates and major community events." • Technical modifications to the Growler for noise abatement should be discussed. • Moving some of the OLF FCLP training operations to other base locations in squadron detachment deployments should be discussed. • The historical precedent to not fly at the OLF on weekends, etc. should clearly be stated as a voluntary Navy guideline and not compulsory. I.E. Growlers may be scheduled to fly at the OLF whenever the NASWI command determines it is required for the mission. 5. Risks of single siting of all of the electronic warfare aircraft for the entire U.S. military



mission at NASWI is not sufficiently evaluated in the DEIS. Such risks should be evaluated and include:

- Seismic events, including consequences of shaking, tsunamis, liquefaction and ground subsidence from a major Cascadia Fault subduction-zone earthquake. Section 3.14.2.3 in the DEIS inadequately and erroneously states that the “most recent apparent significant activity was approximately 18,000 years ago”. In fact, there is substantial evidence that a major earthquake affecting the entire Puget Sound region occurred as recently as the 1700's. See Atwater, Brian F. et al., *The Orphan Tsunami of 1700: Japanese Clues to a Parent Earthquake in North America*, 2nd ed., United States Geological Survey and University of Washington Press, 2015. The best available science points to seven Cascadia Fault earthquakes having occurred in the last 3,500 years, with an average interval of 500 years. Some geologists estimate a 10% chance of such a major earthquake, with up to a magnitude of 9, occurring within the next 50 years. This seismic risk must be properly evaluated in the EIS.
- Terrorism, including access vulnerability of Ault Field and OLF. State Highway 20 borders the east side of OLF Coupeville. Patmore Road crosses the North end of runway 32 at the OLF. Keystone road borders the West boundary of the OLF. All these roads very close to and within eyesight of the runway. Additionally, the bridge, ferries, and NASWI Base utilities (water, electricity, gas) are an easy target for terrorists.
- Access to the base. Many NASWI personnel live off of Whidbey Island and commute via the ferries and Deception Pass Bridge. Disruption of service or failure of access of these will pose a major operational risk. Indeed, when all Coupeville to Port Townsend ferries were summarily removed from service on 11/21/2008 it caused a major transportation crisis. The 82-year old Deception Pass bridge is a critical access point risk that must be evaluated. The bridge has been identified as in-need of a seismic retrofit.
- Damage or maintenance to Ault Field runways will affect readiness and ability to deploy aircraft, or conduct routine training, leaving much of the military's EW aircraft grounded.
- Utilities are vulnerable. The NASWI base and Oak Harbor city water supply cross the Deception Pass Bridge. The entire electricity supply for Whidbey Island crosses at Deception Pass – there is not a secondary supply route. The natural gas supply to North Whidbey Island, including the Base, also crosses at Deception pass. A single, catastrophic event at Deception Pass could affect all these utilities, and operations at NASWI.

6. Expected crash frequency and accident potential of crashes of the Growler is not addressed adequately in the DEIS. Environmental impacts resulting from a crash are not addressed. There are well-documented crashes in the Growler, and it's sister aircraft the Hornet, that can be used to estimate the expected frequency of mishaps. The statement in section 4.3.2.1 that “While it is generally difficult to project future safety/mishap rates....the Growler has a well-documented and established safety record...” is subjective and wholly inadequate. The EIS should include detailed crash risk analysis including for the following: Sole-source drinking water aquifers, homes, businesses, schools, hospital, County and City governments, Island Transit center, County Solid waste facility, disruption to emergency response agencies (Sheriff, hospital, EMS), weather conditions and BASH hazard. The crash risk assessment should include factors specific for the expected mission at NASWI, such as: training new pilots, night operation, the OLF being 2,600 feet short of Navy regulation, the proximity of State Highway and County Roads to the OLF.

7. The impact on Children is not adequately addressed in the DEIS. The EIS should fully consider the following:

- Learning disability: The DEIS describes increased interruptions at school, but not how this will impact learning. Learning disability outside of the classroom should also be evaluated.
- Hearing damage: Many children live, attend

school, and play within areas impacted by this proposal, in which increased noise will cause hearing damage. The National Institute of Health (NIOSH, <https://blogs.cdc.gov/niosh-science-blog/2016/02/08/noise>) states that the maximum daily noise dose is reached in 15 min at 100 dB and, that for every 3 dB increase in noise, the allowable exposure time is reduced by half. By these guidelines the maximum daily noise exposure is 3 minutes at 109 dB. This exposure level is currently common in a wide area of central Whidbey Island near the OLF. The proposed action will dramatically increase likely hearing damage to children. • NIOSH (see above) recommends that hearing protection be worn whenever noise levels exceed 85 dB(A), regardless of duration. This peak noise level will be realized at Coupeville schools, playfields, and Rhododendron park ball fields. The EIS should discuss how the Navy will provide hearing protection education, and how use and adoption of hearing protection most days throughout the year will be realized and expected hearing damage for the expected number of children who will not adopt/use hearing protection. • Noise impacts at the Coupeville Elementary School is evaluated in the DEIS. The EIS should also evaluate impacts at Coupeville High School and Middle School, which are significantly closer to the OLF noise source than the elementary school. • The impact on children (as well as parents and coaches) using the ball fields at Rhododendron Park, including scheduling operations so as to minimize impacts and hearing damage. The analysis should recognize the difficulty of logistics and implementation for using hearing protection while practicing and playing soccer, baseball and softball games. 8. The Economic impact on the Central Whidbey community is not addressed adequately. Loss of tourism, property value loss, decline of population, & loss of business all need to be evaluated more carefully. • Section 4.10.2.1 describes the likely loss of property value due to increased noise, but doesn't quantify what that total effect will be. The EIS should quantify the loss of property value. • The "positive" economic effects of short-term construction, increased payroll, and increased tax revenues from an increasing population are quantified by the DEIS. However, that economic gain is not balanced against the certain economic losses of a reduced tax base due devaluation, population migration away from noise in the region, loss of business, reduction in migration and investment in property by retirees and others of wealthier demographics who would, otherwise, move to Whidbey for the environment and quality of life, and support sustainable, local business, such as organic farming, custom home building, and renewable energy. The EIS needs to evaluate the economic losses associated with the proposal. 9. The Impact to natural resources is not addressed adequately in the DEIS. Impacts to the following should be addressed more completely in the EIS: • Bird populations & migration. Whidbey Island is a major bird migration route within the Pacific Flyway. • Fish and animal habitat. • Ebey's Landing National Historic Reserve, including the rural soundscape & visitor experience. • Surface and ground water quality, including from Growler fuel dumping, crashes, and crash response. 10. The frequency, quantity, and effects of fuel dumping from Growler operations are not addressed in the DEIS. 11. Outdoor Recreation impacts are not addressed adequately. Whidbey Island quality of life and tourism is highly tied to outdoor recreation. Increased Growler operations will significantly impact recreation. The EIS should address the following: • Activities: Outdoor competitive sports (school and other), walking, hiking, running, fishing, hunting, camping, road bicycling, mountain biking, kayaking, bird watching, historical tours, dog walking, picnicking, beach combing, gardening, swimming. • Locations: Schools; sporting fields, tracks, etc; State Parks, County Parks, City Parks; Ebey's Landing National Historical Reserve; Kettles Trail

system, off-Leash dog parks, private community swimming pools, wildlife viewing areas (such as Crockett Lake & Keystone Spit); rural road networks, residences. 12. Effect of Accident Potential Zones (APZ) at OLF are not sufficiently evaluated. Section 4.3.2.1 in the DEIS describes conceptual APZ's at OLF Coupeville. Yearly operations at the OLF were below 5000 at the time of the 2005 AICUZ study, and APZ's were unwarranted at the time. However, annual operations have exceeded 5000 since 2009. Any scenario (even no action) will require the Navy recommend establishing APZ's at OLF Coupeville.

- The EIS should describe in detail the consequences of establishing APZ's at the OLF including: lowering of property values; restriction of property and development rights; accident potential risk for people, homes, businesses, and institutions located under APZ's; loss in property taxes to Island County and the Town of Coupeville; and the potential loss of business and economic consequences for businesses in and around the OLF.
- Actual, binding APZ's should be drawn for each scenario described in the EIS. Homeowners, businesses, tax-supported agencies, elected representatives, realtors, planners, farmers, and other stakeholders all deserve to know what to expect.

13. OLF operations are misrepresented as historically normal in Section 1.4. Section 4.1.2.1 misstates that the proposed action "represents a level of operation similar to historic levels of operations experienced over the life of the airfield". The graph of Previous Airfield Operations for Ault Field and OLF Coupeville on page 1-6 shows that from 1976 through 2015 OLF Coupeville experienced an average of approximately 13,200 operations per year. A more representational average would be for the 18 years since the A-6 Intruder stopped flying in 1997, which is approximately 5,500 operations per year. The proposed increase of 29,000 operations under Alternative A would be a total of approximately 34,500 operations per year. At no time in the history of OLF Coupeville has the number of operations been at the proposed level under this Alternative. This action would be, in fact, an increase of approximately 530% over the average operations since 1997. The proposed increase of 2,700 operations under Alternative C would be a total of 8,200 operations per year. This would represent a 49% increase over the historical average of FCLP operation at OLF Coupeville since 1997. Thus, the EIS should state that, under any scenario, the proposed action represents a significant change in the number of operations at OLF Coupeville. -end-

Coupeville, WA 98239

The following have not been considered in the DEIS or have not been considered adequately: 1. Actual, real-time noise measurement, on-site during operations. DEIS noise analysis is based strictly on computer modeling. 2. Jet noise reduction options 3. Crash frequency and impacts 4. Alternatives to using the Coupeville OLF 5. The strategic danger of housing nearly all Electronic Warfare planes at a single site 6. Impacts on school children – childhood learning, hearing damage – while in school or outside playing. 7. Economic impact on tourism, property value loss, decline of population, and loss of businesses. 8. impact on natural resources: bird migration and animal habitat 9. Detriment to Ebey's Landing National Historic Reserve 10. Frequency and effects of fuel dumping 11. Risk of exposure to electromagnetic radiation from weaponized forms of directed energy aboard Navy jets 12. Water contamination of a sole-source aquifer from fire retardant chemicals.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.l. Bird Migration
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 19.d. Electronic Warfare
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve

**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military) \_\_\_\_\_

3. Address \_\_\_\_\_ *Coupeville 98259*

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound. *Including mental & emotional*
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise. *A six-fold increase will deprecimate our home's value.*

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children’s and family’s health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy’s prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

Determine APZ's BEFORE decision is made on number of operations at OLF.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

Environmental Impact Statement Comment Form  
EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by February 24, 2017  
SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name [Redacted]  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
3. Address [Redacted] Coupeville 98239  
4. Email [Redacted]

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Comments

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- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 12.p. Local Differences in Economy
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquifer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

Economic impact on Coupeville vs Oak Harbor — O.H. receives nearly all of any economic benefit, yet the Navy's preference is for 80% of the operations to be done at OLF.

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For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



Langley, WA 98260

The expansion of the Growler presence at NAS Whidbey is a bad idea for several reasons. The OLF is already of inadequate size and not particularly safe with housing for homeless youth, a hospital and 3 schools in potential crash areas. The sound is already at an inhuman level. The Oak harbor schools are already crammed, and there is absolutely no low-income rental housing on all of Whidbey already--it's a big problem here. The Navy needs to examine this idea a lot more thoroughly and with a much more open mind. Thank you.

1.a. Thank You  
12.i. Housing Access and Affordability  
12.m. Education Impacts  
4.p. Sleep Disturbance  
4.q. Potential Hearing Loss  
4.r. Nonauditory Health Effects  
4.s. Health Impact Assessment and Long-term Health Study Requests  
5.a. Accident Potential Zones  
7.b. Land Use Compatibility and Air Installations Compatible Use Zones

Friday Harbor, WA 98250

Please actually measure Growler traffic noise rather than relying on simulations. In the future, Growlers should be equipped with NADs (noise attenuating devices), as the dB reduction is very significant. Growler flights near the San Juan Islands are a continual source of interruption, distraction, and inconvenience. All efforts to quiet the engine noise will be appreciated. I've heard you save 20 minutes of flight time by not keeping the Growlers in Idaho. Twenty minutes.

- 1.a. Thank You
- 12.n. Quality of Life
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.t. Noise Mitigation

Clinton, WA 98236

The DEIS does not properly address the impacts to central Whidbey, especially the noise. The DEIS uses an inappropriate measure of the noise, since the loudest noises are in low frequencies. The DEIS says the noise has no significant impact, yet neighbors of the OLF regularly plug their ears, stop communicating, etc., because the noise is not bearable. This has potential impacts of the residents, especially children and appears to violate OSHA standards. It impacts property values as well as quality of life. Additionally, water quality for those that have no other source of water, such as the town of Coupeville, have threats to their groundwater supply, as shown by the recent testing for toxins relating to crashes. The EIS must address the potential for destroying the availability of groundwater as well as the noise in the flight path. This is especially relevant given the great increase in probability of an accident with the increase in flights at the OLF. The Navy should compensate residents for the impact on their lives.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 4.d. Day-Night Average Sound Level Metric
- 4.l. Points of Interest
- 4.q. Potential Hearing Loss

# Environmental Impact Statement Comment Form EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by February 24, 2017

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*resident*

3. Address \_\_\_\_\_ *Langley, WA 98260*

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

### Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
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- 7.g. Ebey's Landing National Historical Reserve
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- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

*I'm concerned about the health of agri business in Central Whidbey. There are many successful growing operations of fruits and vegetables that come into farmers markets and then into the food chain of all island consumers. These farms will perish if the ground water and wells they depend on are contaminated by Navy fire-retardant chemicals. It is not possible to water a farm field with bottled water! And the working conditions on these farms is greatly impacted by the high decibel noise of the Growlers.*

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1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Coupeville, WA 982394308

I write today as a supporter of the Navy on Whidbey Island. My wife and I were aware of the OLF and the noise that entails when we chose our house and have little sympathy for those who claim retroactive ignorance. However, in my view, most of the scenarios under consideration in this EIS represent a violation of an implied contract between the Navy and residents in the Coupeville area. The 'no action alternative' indicates a 71/29 split in FCLPs between Ault Field and OLF. I believe the Navy has right to continue operations at the OLF but also has an implicit contract with the people of Central Whidbey Island to hold operations at a level similar to the recent past. There is little to choose from a noise perspective between the various "alternatives". Under each alternative, Scenarios C does the least harm but still represent roughly a 50% increase in FCLPs over the no-action alternative. Scenarios A and B represent a life-changing increase in noise that I believe violate the implied contract between the Navy and inhabitants of the Coupeville area. In my view, the Navy's choice should be between the no-action alternative and one of the Scenarios C. A 20/80 split between OLF and Ault Field most closely resembles the current 29/71 split and keeps the majority of noise where it has always been, in a community (Oak Harbor) that is closely tied to the Navy, and avoids destruction of a peaceful, rural way of life in and near Coupeville.



**Draft Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by January 25, 2017**

Online at: [www.whidbeyeis.com](http://www.whidbeyeis.com)

By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Resident*

3. Address [REDACTED] *Coupeville WA 98239*

4. Email [REDACTED]

5. Phone [REDACTED]

6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
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- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.a. Regional Land Use and Community Character

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

- Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations by 36 % to 475%, with up to 135 flight operations daily, will double the residential areas and increase by 10-fold the commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**
- Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.
- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

- The Navy did not adequately look at siting new Growler aircraft elsewhere**, despite this being the #1 request from the community during the Navy's prior scoping forums.
- An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.**
- Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries.** All active electronic warfare jets in the US Military would be at NASWI.
- The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia**, with over 100 incidents in all F/A-18 airframes in 2015 alone. Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Please include any additional comments here:

## What else you can do

1. **Get involved.** To volunteer, email us: [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
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  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

## To Learn More

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# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

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- 1. Name
- 2. Organization/Affiliation
- 3. Address
- 4. E-mail
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

I support the Navy. I am not sure that the Navy supports or cares about the Coupeville community.

The Navy's EIS report is incomplete. It ignores scientific research, which shows severe HEALTH effects on those living under the ongoing, horrendous impact of SOUND - ear-piercing flights right over our homes. It is

ACTION - Move all flights to NON-RESIDENTIAL AREAS!  
NO INCREASE in FLIGHTS! DECREASE! Already too many!!

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 1.d. General Project Concerns
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.n. Alternatives Considered But Eliminated
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects



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This is a sham - it feels like propoganda.  
 I heard the navy relocated here for the benefit of their families - what about our families, our real estate values, our health, our animal friends, our environment??? This summer when I was outside more, I suffered. I know it was the increase of growler activity - each person is wired differently and so it affects different people in different ways. I am sensitive and I can't sleep and I get depressed by the vibration.

Please go to an island in the middle of the ocean. Please print • Additional room is provided on back. Make your own island. Please

Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS** leave us alone!!

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 12.j. Property Values
- 2.a. Purpose and Need
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

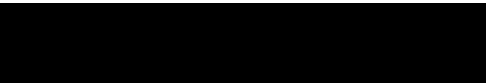
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1. Name 

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)

3. Address  *Ct Coupeville 98239*

4. Email 

5. Phone 

6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
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- 7.a. Regional Land Use and Community Character

**Comments**

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**Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.

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Please include any additional comments here:

## What else you can do

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2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
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  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

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Sequim, WA 98382

1.a. Thank You

7.d. Recreation and Wilderness Analysis and Study Area

I am sure it will do no good to comment but, just in case; My wife and I dislike very much hearing those growlers when we are working in our yard and sometimes, even in our home. It is frightening! I live in a community with a lot of elderly and I am sure many feel the way we do. There has to be a better place to practice!

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1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*RESIDENT CITIZEN VETERAN*

3. Address [REDACTED] *Coupeville WA*

4. Email [REDACTED] *98239*

5. Phone [REDACTED]

6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

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(over)

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- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
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- ☑ **The Navy did not adequately look at siting new Growler aircraft elsewhere**, despite this being the #1 request from the community during the Navy's prior scoping forums.
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- ☑ **Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries.** All active electronic warfare jets in the US Military would be at NASWI.
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  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

## To Learn More

- ✓ To receive email updates, or to get involved, **email us** at [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at [www.whidbeyeis.com](http://www.whidbeyeis.com)

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

Crockett Lake Water District, WA 98239

The Navy DEIS on increased Growler training flights over Whidbey Island residents is seriously flawed. I have heard independent evidence from several sources that the decibal levels on the ground from Growler training flights are much higher than those reported in the DEIS. Computer models are not appropriate when actual data is available. The final EIS must acknowledge the serious physical hazzards that increased Growler training flights will create. The DEIS does not give adequate consideration to the "crash zone" issue. With the proposed huge increase in the number of Growler training flights the potential for crashes in our neighborhoods has a great potential impact.....a literal impact. The DEIS is superficial and the data used is inadequate to describe the devastating impact that increased Growler training flights would have on the Whidbey environment.

1.a. Thank You

4.f. Noise Measurements/Modeling/On-Site Validation

5.a. Accident Potential Zones



Crockett Lake Water District, WA 98239

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1.a. Thank You

4.f. Noise Measurements/Modeling/On-Site Validation

5.a. Accident Potential Zones

Crockett Lake Water District, WA 98239

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1.a. Thank You

4.f. Noise Measurements/Modeling/On-Site Validation

5.a. Accident Potential Zones

Coupeville, WA 98239

I have deep concerns about the viability of our water supply, specifically: 1. The risk of water contamination to the sole-source aquifer in central Whidbey Island surrounding OLF Coupeville is not adequately addressed in the DEIS. The following should be evaluated:

- Risk and effects of a Growler crash and of the aqueous film forming foam that will be used for firefighting.
- The susceptibility of geology and soils in the potential aircraft accident zones surrounding the OLF to infiltration of pollutants into the ground water.
- No alternative water source for Town of Coupeville and surrounding community.
- Viability, cost, and impact of remediation of groundwater pollutants and of providing alternative drinking water source.
- The full short and long-term impacts, including environmental, cultural, & financial.

1.a. Thank You

11.a. Groundwater

11.d. Per- and Polyfluoroalkyl Substances

12.k. Compensation to Citizens for Private Property

Coupeville, WA 98239

1.a. Thank You

4.a. General Noise Modeling

4.f. Noise Measurements/Modeling/On-Site Validation

. Noise modeling used in DEIS is not appropriate for and representative of noise made by Growlers. • DoD's Strategic Environmental Research and Development Program (SERDP) found NOISEMAP ver 7.2 to be outdated and possibly not able to provide "legally defensible aircraft noise assessments of current and future aircraft operations". The modeling program was developed to assess civilian airport noise. The noise evaluation model used in the EIS should be appropriate to evaluate Growler noise on the surrounding community. • The Naval Research Advisory Committee has acknowledged that variations in noise from tactical aircraft measurement standards are not addressed in standards for commercial aircraft, and that there are no standards for acquiring near-field aircraft noise data. The EIS evaluation should account for variations in noise measured from Growlers compared to commercial aircraft. • Noise averaging (Ldn) is inappropriate for Growler FCLP flights at OLF Coupeville, which occur sporadically. Studies by Borskya and Stephensb show that maximum dBA readings are better indicators of community annoyance than Ldn. Generally frequent maximum sounds of 70 dBA or greater correlate in a linear fashion with community annoyance. The Coupeville community regularly experiences maximum noise exceeding 90 dBA, often exceeding 100 dBA, near and around the OLF flight path. The EIS should show maximum noise contours based on this metric. a) Borsky, PN: Integration of Multiple Aircraft Noise Exposure Over time by Residents Living Near US Air Force Bases, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1049-1060, 1983. b) Stephens, DG, Powell, CA: Human Response to Aircraft and Other Noise Events, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1061-1072, 1983. • The noise model and DEIS doesn't sufficiently assess the physical and mental harm, annoyance, disturbance to life and business, childhood learning, economy, tourism from noise. • Actual noise measurements have not been made by the Navy. Actual peak noise measurements should be made for the EIS, at several more POI's than identified in the DEIS. Individual sound measurements made by the National Park Service and others in the Central Whidbey community show noise levels far in excess of that predicted by DEIS modeling. • OSHA maximum noise exposure limits are 110 dB for 30 min per day, or 115 dB for 15 min per day (slow response). Growler operations at the OLF have been measured exceeding these sound levels at several locations, including my home and adjacent business, and at Rhododendron Park. Thus, the proposed action may exceed OSHA guidelines. The EIS should evaluate noise exposure based on OSHA guidelines, and state that OSHA noise exposure limits may be exceeded. • Washington State law (WAC 296-817-20025) requires that employers in the State post warning signs in areas where noise levels will exceed 115 dB. The EIS should state that the Navy will make public notice, and request local jurisdictions to post warning signs, in public areas where noise levels exceed 115 dB. • Submitted separately 2/16/17, via website A-weighted sound measurements (dBA) are used in the noise analysis of the DEIS, which emphasizes the 1,000 to 4,000 Hz range (DEIS at p. A-142). However, the Growler emits substantial low-frequency sound, not reported by dBA. See Environmental Assessment for the Expeditionary Transition of EA-6B Prowler Squadrons to EA-18G Growler at Naval Air Station Whidbey Island, Oak Harbor, Washington, Final, October

2012 (the "2012 EA"), Department of the Navy, pages 38-39, Wyle report WR 10-22. As stated therein, "NASWI has received complaints of building rattle/vibration due to Growler events . . . With its increased low-frequency content, the Growler takeoff events have higher potential to cause noise-induced vibration." Frequency profiles, shown on page 39 of that report, indicate substantial sound levels at frequencies below 100 Hz. dBA sound levels are, therefore, an incomplete measurement of Growler noise during FCLP operations, which leads to underestimating perceived sound levels and effects on people and property. The final EIS should clearly convey the lack of correlation between A-weighted measurements and the Growler sound spectrum, or should adopt a different, or additional, measurement standard. • The EIS should fully discuss the 2016 National Park Service (NPS) sound monitoring report in Ebey's Landing National Historic Reserve (ELNHR), as compared to the Day-Night Average Sound Level modeling method used (DEIS, pg 1-23). The actual sound measurements made in the NPS report suggest that the noise predicted by the modeling used in the DEIS could be dramatically underestimated.

Coupeville, WA 98239

1.a. Thank You  
2.k. Range of Alternatives  
2.l. No Action Alternative

. Alternatives to increasing Growler operations at the Coupeville OLF should be fully addressed in the EIS. The discussion should include consideration of the following: • The “No Action” alternative in the DEIS was dismissed as not meeting the Navy’s mission objectives, without a full and objective evaluation of alternatives. This is in violation of NEPA requirements. By not considering viable alternatives that could meet the Navy’s mission without increasing operations at OLF Coupeville the DEIS appears to justify a predetermined decision. • Other landing strips in the region were dismissed as not viable for reasons including not meeting Navy safety standards for OLF’s. This evaluation neglected the fact that OLF Coupeville, itself, does not meet Navy OLF standards. • Detachment training options, at other military air stations that meet standards for FCLP training. Such detachment training is presently being conducted for squadrons from NASWI.

1.a. Thank You  
4.t. Noise Mitigation

Coupeville, WA 98239

. Growler noise mitigation and abatement methods, operations and techniques should be thoroughly considered in the EIS. The DEIS discusses aircrew compliance and performance of policy, procedures, course rules, "good common sense", and "prudent airmanship techniques" (pg 3-30) as established methods to minimize noise impacts. Additionally, "NAS Whidbey Island has historically worked with elected officials from surrounding communities to best minimize impacts where practicable, including not flying at the OLF on weekends and minimizing flight activity during major school testing dates and major community events." • Technical modifications to the Growler for noise abatement should be discussed. • Moving some of the OLF FCLP training operations to other base locations in squadron detachment deployments should be discussed. • The historical precedent to not fly at the OLF on weekends, etc. should clearly be stated as a voluntary Navy guideline and not compulsory. I.E. Growlers may be scheduled to fly at the OLF whenever the NASWI command determines it is required for the mission.

Coupeville, WA 98239

Risks of single siting of all of the electronic warfare aircraft for the entire U.S. military mission at NASWI is not sufficiently evaluated in the DEIS. Such risks should be evaluated and include:

- Seismic events, including consequences of shaking, tsunamis, liquefaction and ground subsidence from a major Cascadia Fault subduction-zone earthquake. Section 3.14.2.3 in the DEIS inadequately and erroneously states that the “most recent apparent significant activity was approximately 18,000 years ago”. In fact, there is substantial evidence that a major earthquake affecting the entire Puget Sound region occurred as recently as the 1700’s. See Atwater, Brian F. et al., *The Orphan Tsunami of 1700: Japanese Clues to a Parent Earthquake in North America*, 2nd ed., United States Geological Survey and University of Washington Press, 2015. The best available science points to seven Cascadia Fault earthquakes having occurred in the last 3,500 years, with an average interval of 500 years. Some geologists estimate a 10% chance of such a major earthquake, with up to a magnitude of 9, occurring within the next 50 years. This seismic risk must be properly evaluated in the EIS.
- Terrorism, including access vulnerability of Ault Field and OLF. State Highway 20 borders the east side of OLF Coupeville. Patmore Road crosses the North end of runway 32 at the OLF. Keystone road borders the West boundary of the OLF. All these roads very close to and within eyesight of the runway. Additionally, the bridge, ferries, and NASWI Base utilities (water, electricity, gas) are an easy target for terrorists.
- Access to the base. Many NASWI personnel live off of Whidbey Island and commute via the ferries and Deception Pass Bridge. Disruption of service or failure of access of these will pose a major operational risk. Indeed, when all Coupeville to Port Townsend ferries were summarily removed from service on 11/21/2008 it caused a major transportation crisis. The 82-year old Deception Pass bridge is a critical access point risk that must be evaluated. The bridge has been identified as in-need of a seismic retrofit.
- Damage or maintenance to Ault Field runways will affect readiness and ability to deploy aircraft, or conduct routine training, leaving much of the military’s EW aircraft grounded.
- Utilities are vulnerable. The NASWI base and Oak Harbor city water supply cross the Deception Pass Bridge. The entire electricity supply for Whidbey Island crosses at Deception Pass – there is not a secondary supply route. The natural gas supply to North Whidbey Island, including the Base, also crosses at Deception pass. A single, catastrophic event at Deception Pass could affect all these utilities, and operations at NASWI.

1.a. Thank You

1.e. Risk of Terrorist Attack

14.d. Bridges and Ferries

16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)

2.a. Purpose and Need

2.d. Program of Record for Buying Growler Aircraft

3.a. Aircraft Operations



Coupeville, WA 98239

Expected crash frequency and accident potential of crashes of the Growler is not addressed adequately in the DEIS. Environmental impacts resulting from a crash are not addressed. There are well-documented crashes in the Growler, and its sister aircraft the Hornet, that can be used to estimate the expected frequency of mishaps. The statement in section 4.3.2.1 that "While it is generally difficult to project future safety/mishap rates....the Growler has a well-documented and established safety record..." is subjective and wholly inadequate. The EIS should include detailed crash risk analysis including for the following: Sole-source drinking water aquifers, homes, businesses, schools, hospital, County and City governments, Island Transit center, County Solid waste facility, disruption to emergency response agencies (Sheriff, hospital, EMS), weather conditions and BASH hazard. The crash risk assessment should include factors specific for the expected mission at NASWI, such as: training new pilots, night operation, the OLF being 2,600 feet short of Navy regulation, the proximity of State Highway and County Roads to the OLF.

1.a. Thank You

5.a. Accident Potential Zones

5.d. Environmental Health Risks and Safety Risks to Children

Coupeville, WA 98239

The impact on Children is not adequately addressed in the DEIS. The EIS should fully consider the following:

- Learning disability: The DEIS describes increased interruptions at school, but not how this will impact learning. Learning disability outside of the classroom should also be evaluated.
- Hearing damage: Many children live, attend school, and play within areas impacted by this proposal, in which increased noise will cause hearing damage. The National Institute of Health (NIOSH, <https://blogs.cdc.gov/niosh-science-blog/2016/02/08/noise>) states that the maximum daily noise dose is reached in 15 min at 100 dB and, that for every 3 dB increase in noise, the allowable exposure time is reduced by half. By these guidelines the maximum daily noise exposure is 3 minutes at 109 dB. This exposure level is currently common in a wide area of central Whidbey Island near the OLF. The proposed action will dramatically increase likely hearing damage to children.
- NIOSH (see above) recommends that hearing protection be worn whenever noise levels exceed 85 dB(A), regardless of duration. This peak noise level will be realized at Coupeville schools, playfields, and Rhododendron park ball fields. The EIS should discuss how the Navy will provide hearing protection education, and how use and adoption of hearing protection most days throughout the year will be realized and expected hearing damage for the expected number of children who will not adopt/use hearing protection.
- Noise impacts at the Coupeville Elementary School is evaluated in the DEIS. The EIS should also evaluate impacts at Coupeville High School and Middle School, which are significantly closer to the OLF noise source than the elementary school.
- The impact on children (as well as parents and coaches) using the ball fields at Rhododendron Park, including scheduling operations so as to minimize impacts and hearing damage. The analysis should recognize the difficulty of logistics and implementation for using hearing protection while practicing and playing soccer, baseball and softball games.

- 1.a. Thank You
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 7.j. Impacts on Outdoor Sports

Coupeville, WA 98239

The Economic impact on the Central Whidbey community is not addressed adequately. Loss of tourism, property value loss, decline of population, & loss of business all need to be evaluated more carefully. • Section 4.10.2.1 describes the likely loss of property value due to increased noise, but doesn't quantify what that total effect will be. The EIS should quantify the loss of property value. • The "positive" economic effects of short-term construction, increased payroll, and increased tax revenues from an increasing population are quantified by the DEIS. However, that economic gain is not balanced against the certain economic losses of a reduced tax base due devaluation, population migration away from noise in the region, loss of business, reduction in migration and investment in property by retirees and others of wealthier demographics who would, otherwise, move to Whidbey for the environment and quality of life, and support sustainable, local business, such as organic farming, custom home building, and renewable energy. The EIS needs to evaluate the economic losses associated with the proposal.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.d. Population Impacts
- 12.h. Tourism
- 12.j. Property Values

Coupeville, WA 98239

Impact to natural resources is not addressed adequately in the DEIS. Impacts to the following should be addressed more completely in the EIS: • Bird populations & migration. Whidbey Island is a major bird migration route within the Pacific Flyway. • Fish and animal habitat. • Ebey's Landing National Historic Reserve, including the rural soundscape & visitor experience. • Surface and ground water quality, including from Growler fuel dumping, crashes, and crash response.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.l. Bird Migration
- 11.a. Groundwater
- 11.b. Floodplains and Wetlands
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

Coupeville, WA 98239

1.a. Thank You  
6.f. Fuel Dumping

The frequency, quantity, and effects of fuel dumping from Growler operations are not addressed in the DEIS.

Coupeville, WA 98239

Effect of Accident Potential Zones (APZ) at OLF are not sufficiently evaluated. Section 4.3.2.1 in the DEIS describes conceptual APZ's at OLF Coupeville. Yearly operations at the OLF were below 5000 at the time of the 2005 AICUZ study, and APZ's were unwarranted at the time. However, annual operations have exceeded 5000 since 2009. Any scenario (even no action) will require the Navy to recommend establishing APZ's at OLF Coupeville. • The EIS should describe in detail the consequences of establishing APZ's at the OLF including: lowering of property values; restriction of property and development rights; accident potential risk for people, homes, businesses, and institutions located under APZ's; loss in property taxes to Island County and the Town of Coupeville; and the potential loss of business and economic consequences for businesses in and around the OLF. • Actual, binding APZ's should be drawn for each scenario described in the EIS. Homeowners, businesses, tax-supported agencies, elected representatives, realtors, planners, farmers, and other stakeholders all deserve to know what to expect.

1.a. Thank You

12.c. Socioeconomic Impacts

12.f. Economic Hardship and Impacts

5.a. Accident Potential Zones

7.b. Land Use Compatibility and Air Installations Compatible Use Zones

Coupeville, WA 98239

- 1.a. Thank You
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 3.j. Flight Simulators

OLF operations are misrepresented as historically normal in Section 1.4. Section 4.1.2.1 misstates that the proposed action "represents a level of operation similar to historic levels of operations experienced over the life of the airfield". The graph of Previous Airfield Operations for Ault Field and OLF Coupeville on page 1-6 shows that from 1976 through 2015 OLF Coupeville experienced an average of approximately 13,200 operations per year. A more representational average would be for the 18 years since the A-6 Intruder stopped flying in 1997, which is approximately 5,500 operations per year. The proposed increase of 29,000 operations under Alternative A would be a total of approximately 34,500 operations per year. At no time in the history of OLF Coupeville has the number of operations been at the proposed level under this Alternative. This action would be, in fact, an increase of approximately 530% over the average operations since 1997. The proposed increase of 2,700 operations under Alternative C would be a total of 8,200 operations per year. This would represent a 49% increase over the historical average of FCLP operation at OLF Coupeville since 1997. Thus, the EIS should state that, under any scenario, the proposed action represents a significant change in the number of operations at OLF Coupeville.

1.a. Thank You

7.d. Recreation and Wilderness Analysis and Study Area

Coupeville, WA 98239

Outdoor Recreation impacts are not addressed adequately. Whidbey Island quality of life and tourism is highly tied to outdoor recreation. Increased Growler operations will significantly impact recreation. The EIS should address the following:

- Activities: Outdoor competitive sports (school and other), walking, hiking, running, fishing, hunting, camping, road bicycling, mountain biking, kayaking, bird watching, historical tours, dog walking, picnicking, beach combing, gardening, swimming.
- Locations: Schools; sporting fields, tracks, etc; State Parks, County Parks, City Parks; Ebey's Landing National Historical Reserve; Kettles Trail system, off-Leash dog parks, private community swimming pools, wildlife viewing areas (such as Crockett Lake & Keystone Spit); rural road networks, residences.



Coupeville, WA 98239

The EIS must include consideration of the APZ that will be necessitated by the increase in Growler flights. What implications are there for homeowners, churches, schools and businesses included in the zone. If these properties must vacate, what will the economic impact be to Island County?

1.a. Thank You

5.a. Accident Potential Zones

7.b. Land Use Compatibility and Air Installations Compatible Use Zones

Coupeville, WA 98239

The consolidation of all the Navy's Growlers at Ault Field may reduce costs and achieve efficiencies, but it also creates a most inviting target for terrorists or enemy attack, as well as putting all at risk in case of a natural disaster.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

Coupeville, WA 98239

1.a. Thank You

5.a. Accident Potential Zones

I am deeply concerned about the likelihood of an APZ being established for OLF, something not covered in the DEIS. An APZ would likely have catastrophic economic consequences for the County, the town of Coupeville, and individual property owners. It must be covered, in detail, in the EIS, with a comment period to assess the impact.

**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*resident*

3. Address [REDACTED] *Coupeville*

4. Email [REDACTED]

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

**Please check all that concern you and add additional comments on the back.**

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

The economy of Coupeville, dependent as it is on tourism and small farming, receives little or no economic benefit from the Navy presence and considerable harm.

The city of Oak Harbor receives considerable economic benefit from the Navy in its businesses & real estate market.

Let the area that receives the most benefit endure the most noise.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

**For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)**

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*resident*

3. Address [REDACTED] *Coupeville*

4. Email [REDACTED]

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- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
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- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

The lack of an APZ means many residents have settled here and built or purchased homes unaware of the possibility of an APZ resulting from the Navy's increased activity. Such an APZ would destroy our property values and wipe out our retirement investments.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by February 24, 2017**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_ *resident* \_\_\_\_\_

3. Address \_\_\_\_\_ *Coupeville* \_\_\_\_\_

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

Consolidating Growlers on Whidbey ~~places~~ <sup>cause</sup> undue risks to Whidbey Island's residents, businesses, & visitors, plus the added security risk to the Navy and it's personnel.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

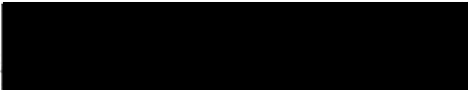
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Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name 

2. Last Name \_\_\_\_\_

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Lopez Island, WA 98261

5. E-mail \_\_\_\_\_

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

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Seattle, WA 98115

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. ACTION: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model. 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. ACTION: Noise levels should only be averaged over active flying days. 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive. ACTION: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe." 6. The Draft includes some independent noise measurements and ignores others. ACTION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. NEPA protection was granted prior to the establishment of the SJI National Monument. ACTION: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA. 8. The three Alternatives considered in the Draft are very similar and are based on old technology - a piloted jet that requires constant pilot training for safe carrier landing. ACTION: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training. 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI. ACTION: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties. 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures are addressed, there is no commitment. ACTION: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision. 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

1.a. Thank You

12.a. Socioeconomic Study Area

12.h. Tourism

2.c. Compliance with the National Environmental Policy Act

2.e. Public Involvement Process

2.k. Range of Alternatives

2.n. Alternatives Considered But Eliminated

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

4.d. Day-Night Average Sound Level Metric

4.f. Noise Measurements/Modeling/On-Site Validation

4.g. Average Annual Day/Average Busy Day Noise Levels

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

4.j. Other Reports

4.r. Nonauditory Health Effects

4.t. Noise Mitigation

7.h. San Juan Islands National Monument



Coupeville, WA 98239

1.a. Thank You  
7.c. Noise Disclosure

Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Coupeville, WA 98239

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children



Coupeville, WA 98239

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

2. The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

Coupeville, WA 98239

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

3. The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

13. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

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Coupeville, WA 98239

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

12. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

10. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

1. Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

1. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).



Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

6. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month").

Coupeville, WA 98239

1.a. Thank You

13.a. Environmental Justice Impacts

9. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Coupeville, WA 98239

1.a. Thank You  
4.j. Other Reports

4. The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruction has to be credibly revised to properly characterize the real impacts.

Coupeville, WA 98239

11. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

Environmental Impact Statement Comment Form  
EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by February 24, 2017  
SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name [Redacted]  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
ABUSED CITIZEN OF THE U.S.  
3. Address [Redacted] Coupeville, WA.  
4. Email [Redacted] 98239

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Comments

Please check all that concern you and add additional comments on the back.

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(over)

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- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
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**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

EXPANDED FLIGHT OPERATIONS  
SIGNIFICANTLY INCREASE THE  
POTENTIAL FOR ACCIDENTS - WE  
HAVE A NEW HOSPITAL, THE COUNTY  
SEAT, AND A NEW HIGH SCHOOL TO  
PROTECT.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

**For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)**

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Coupeville, WA 98239

There is a major security risk for Whidbey Island by siting all Growlers here.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations



Coupeville, WA 98239

- 1.a. Thank You
- 1.d. General Project Concerns

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Coupeville, WA 98239

1.a. Thank You  
4.I. Points of Interest

The DEIS does not include Coupeville Elementary and High School, the Island Transit offices at the north end of OLF, or the hospital. Please include these in the final EIS.

Coupeville, WA 98239

My comments are two-fold: (1) for the flyover of a single aircraft, I find that the noise and vibrations produced by the "replacement" Growlers to be significantly more impactful than for the earlier Prowlers--i.e., to me they seem to be louder and more intrusive. If engaged in conversation outdoors during a flyover, all talk ceases until the aircraft has moved away; indoors, loose objects "buzz" or rattle enough to inhibit conversations. (2) with the previous number of flyovers, the aircraft noise was a tolerable nuisance; with the large increase in the number of flyovers proposed, the impact will be much more severe and frequent--and is more likely to bring multiple aircraft at one time, greatly magnifying the aggregate noise level and disturbance. I think that the proposed Growler operations will cause a severe and immediate reduction in the quality of life for all residents of central Whidbey Island and--in the longer term--will lead to a stagnation or even reduction in visitation by off-islanders. Thus, the economic impact is real, too. After all, today's residents arrived the first time as visitors themselves.

1.a. Thank You

12.h. Tourism

12.n. Quality of Life

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

4.n. Speech Interference (Indoor and Outdoor)

LOPEZ ISLAND, WA 98261

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. ACTION: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model. 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. ACTION: Noise levels should only be averaged over active flying days. 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive. ACTION: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe." 6. The Draft includes some independent noise measurements and ignores others. ACTION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument. ACTION: Evaluate

- 1.a. Thank You
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
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- 4.f. Noise Measurements/Modeling/On-Site Validation
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- 7.h. San Juan Islands National Monument



# Public Meeting Comment Form

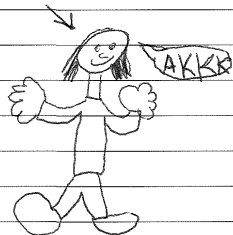
Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

- 1. Name [REDACTED]
- 2. Organization/Affiliation Coupeville elem
- 3. Address [REDACTED]
- 4. E-mail \_\_\_\_\_
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

too loud to work and  
it scares me we want to  
do home work.



Please print • Additional room is provided on back  
Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

As a property owner in Coupeville, I strongly oppose the proposed increase in Growler Airfield Operations at the Naval Air Station on Whidbey Island. The large increase in the numbers of take-offs landings at the OLF on Whidbey Island will have a considerable increased impact on central Whidbey Island and the parklands, schools, and farms within and surrounding the town of Coupeville. In addition to the local population, that part of Whidbey Island is a mecca for tourists, and the noise and chemical pollution, as well as the increased risk from jet accidents, put the public at significant risk.

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones

Port Townsend, WA 98368

I understand from yesterday's Navy outreach event at Fort Worden that the biological study for the Navy's proposed Electronic Warfare range in the western Olympics has been completed. Why was the Pacific Fisher not included in the on environmental impact study on land based mammals? As you are likely aware, this species is being revitalized in the Olympics and this species is both fragile and sensitive to its environment. I suspect its mating habits will be impacted by the noise of low flying aircraft. This seems like an oversight. I have been following this species' introduction and have recorded sighting with the National Park Service within the Olympics. I was assured yesterday that you will take action to ensure this comment finds its way to the correct study area for inclusion as public comment. Thank you

1.a. Thank You

10.a. Biological Resources Study Area

10.b. Biological Resources Impacts

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Port Townsend, WA 98368

1.a. Thank You

7.d. Recreation and Wilderness Analysis and Study Area

I have experienced the deafening noise of low flying jets in the Cascades. The Hoh, Bogachiel, Queets and Quinault watersheds deserve protection as quiet spaces. They are recognized as some of the quietest wilderness in the world. I cannot imagine the change that will occur with 200+ days of sorties each year in these pristine wilderness areas. I ask that you support the effort to certify the Olympic National Park as a "quiet space" and respect the wildlife and environment accordingly. I was assured yesterday at the Fort Worden outreach event that you would ensure my comments are forwarded to the correct study area for inclusion in the public record as public comment. Thank you



1.a. Thank You

, WA

OLF Coupeville needs to have 24 hour access by jets to train for war. There is no environmental impact that has not been previously addressed.

Clinton, WA 98236

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

Clinton, WA 98236

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.

Clinton, WA 98236

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Clinton, WA 98236

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

Clinton, WA

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels



Clinton, WA

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

1.a. Thank You

4.r. Nonauditory Health Effects

Clinton, WA

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

1.a. Thank You

13.a. Environmental Justice Impacts

Clinton, WA

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Clinton, WA

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

[REDACTED]  
Coupeville WA 98239  
[REDACTED]

January 24, 2017

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508

Attn: Code EV21/SS

**Re: Public Comment – NAS Whidbey Island Complex Draft Environmental Impact Statement**

These comments are provided following a review of Volumes I and II of the Navy's Draft Environmental Impact Statement (DEIS) analyzing the impact of potential changes to NAS Whidbey Island, and following participation in the informational presentation at Coupeville Middle & High School on December 9, 2016.

Comments are offered in light of my appreciation for the Navy's obligation and responsibility to protect the United States and the safety of enlisted personnel. Comments also are offered from the perspective of living at 84 E Morris Road in Coupeville since 1980. This property sits within the proposed 65-75 noise contour lines for OLF Coupeville.

Before we purchased our property, we were aware of its location in relation to OLF Coupeville. I recall standing on the property when a jet flew over, holding my infant daughter in my arms and asking my husband, "Can we live with this?" We decided we could, purchased the property and built our home.

As noted in the DEIS, there were periods of time when FCLP exercises increased significantly. Most pilots maintained appropriate altitude and it was "livable" to be in the flight path. Key differences relevant to the DEIS are:

- the difference in loudness between the aircraft of 1980-2010 versus the current Growler aircraft,
- revised flight patterns to accommodate the Growler,
- increased accident potential in residential areas if proposals are implemented.

The Growler aircraft represents technology with a significant "shock and awe" noise difference. Drugstore earplugs are ineffectual against overflights and I no longer can spend any time outside when Growlers fly over or near our house. I now need the earplugs inside, with windows closed, if I hope to sleep (in a house with 6" insulated walls and triple pane windows). Conversation is not possible. My bones vibrate.

The DEIS presents three potential alternatives, each with three possible scenarios splitting Growler flights between Ault Field and OLF Coupeville. A "no action" alternative is listed *for comparison purposes only* as described in section 2.3.1. There is no substantive discussion analyzing a no action alternative, or reviewing serious consideration of other locations. Perhaps that is beyond the scope of the DEIS, which appears to be focused primarily on the noise issue, and also appears to assume that NAS Whidbey is the destination for the Growlers. A thorough environmental impact statement would address the issue.

It appears I am not alone in questioning this decision, as noted in a January 3, 2017 opinion by Colonel H. Wayne Whitten, USMC (Retired) published on the U.S. Naval Institute website, which states in part:

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.j. Property Values
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 2.m. Record of Decision/Preferred Alternative
- 3.a. Aircraft Operations
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.k. Comparison of the Prowler to the Growler
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 7.e. Impacts to Recreation from Noise/Operations
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

"...given that all the EA-18Gs are destined to be homeported at NAS Whidbey Island. It's noble in intent but highly questionable from a roles and mission standpoint that all land-based EW aircraft will be owned by the Navy, the service with the least natural ties and expertise in ground combat operations. To compound that issue is the imbalance in cross-training afforded joint forces if the entire expeditionary EW force is based on the Northwest coast. The inherent logistical advantages of single-site basing must be secondary to restoring joint force operational readiness and improving joint force warfighting capabilities, two key stated objectives of the Chairman of the Joint Chiefs of Staff Gen. Joseph Dunford. ... Bear in mind over half of the Army, Marine Corps, SOF and tactical Air Force units are in the eastern U.S." [emphasis added]

Despite the disclaimer that the scenarios "are not intended to provide a firm division of FLCs between airfields" (which leads me to wonder if the DEIS is a paper exercise), **my strong preference among the options presented is for scenario C in each alternative, for the following reasons:**

1. **The Oak Harbor community derives at least 80% of the financial benefit from NAS Whidbey Island in terms of housing, commerce, taxes, Navy personnel volunteer hours, and Impact Aid funding for schools. Proportionately, 80% of the FCLP operations should occur there.** This statement is supported by the 2005 AICUZ document for NAS Whidbey, which states: "According to the Washington State Office of Financial Management, 88 percent of all economic activity in Island County is directly or indirectly linked to the Navy's presence. The 2003 on-base employment of over 10,000 persons constitutes 68 percent of total employment in Island County." It also is supported by the tables in section 3.10 of the DEIS.
2. **There is overwhelming support for NAS Whidbey Island in Oak Harbor, while opposition to FCLP operations at OLF Coupeville is closer to the norm in central Whidbey.**
3. **Oak Harbor is a city encompassed in significant ambient noise, both from city living and NAS Whidbey Island. Central Whidbey, including the Town of Coupeville, is a rural location where noise intrusions are striking.**
4. **There is serious concern at this time regarding pollution of Whidbey Island's aquifer at/near OLF Coupeville, potentially resulting from NAS Whidbey fire suppression training or events.** This aquifer represents the sole source of water for all of Whidbey Island except the City of Oak Harbor and Navy installations in Oak Harbor.
5. **"Scenario C under any of the three action alternatives would have a long-term, slightly beneficial impact on recreation at the national historical reserve because each of these alternatives would either result in no changes or decreases in the number of noise events, and would decrease the area of the national historical reserve exposed to average annual noise levels above 65 dB DNL, compared to the No Action Alternative."**

Expressing my scenario preference is one purpose of this letter. A second purpose is to note the following serious concerns about the information presented in the draft EIS:

- A. "The intent of this EIS is... to use best available science as required under NEPA to develop an accurate analysis of potential noise impacts from the Proposed Action." This statement should be one of the touchstones upon which the entire DEIS is assessed. The DEIS should – but does not – describe why actual measurements in multiple locations during typical FCLP were not considered to be "best available science." It relies on the DOD-specified metric of DNL averaging, which is done to obtain a "stable representation of the noise environment *free of variations in day-to-day operations or between weekdays and weekends, ...*" 2005 AICUZ
- B. Chapter 2 discusses the proposed action and alternatives, but does not discuss consideration of other locations for the Growlers. Section 2.2 identifies criteria used but does not "discuss" alternative locations. Was thoughtful consideration given to "not putting all the eggs in one basket"? If so, it is not evident from the DEIS.

### C. Metrics Used

Essentially, what has been presented represents:

1. Average Annual Day calculations over 24 hours 7 days per week, further modified by...
2. the DoD Noise Working Group's (DNWG) "Improving Aviation Noise Planning..." to determine the metrics and analysis tools for the DEIS, further modified by...
3. Navy-provided data input,
4. for analysis by NOISEMAP. ("Aircraft noise levels are represented in this EIS by various noise metrics that are generated by a computer model [NOISEMAP] and not actual noise measurements at Ault Field or OLF Coupeville.")

The "Average Annual Day" standard used as the "preferred unit of measure that the Navy believes accurately represents the noise impacts that may arise from the Proposed Action" misrepresents the noise impact at least as significantly as the now-discounted "Average Busy Day" standard that accounts "for noise only when flight operations occur, and concentrating on those days when flight operations exceed the average number of flights for that airfield."

The AAD underestimates the impact and the ABD overestimates the impact.

- There are studies on both sides of this issue.
- Neither calculation is as accurate as actually measuring noise at specific locations, especially since the DEIS acknowledges that "the *Growler is the loudest aircraft currently operating at Ault Field* (Wyle, 2012). *The flight operations and noise environment at OLF Coupeville are largely the result of Growler aircraft performing FCLP at the OLF.*"
- The Growler is also significantly louder than previous aircraft performing FCLP operations on Whidbey Island.

Section 3.2.2.3 references the SEL metric as being used "to describe the sound exposure of a single aircraft event for aircraft stationed at Ault Field." However, this metric condenses "the entire event into a 1-second period of time..." The experience from ground level of each FCLP – and especially from multiple consecutive FCLP operations – is significantly different.

The one-second SEL metric discussion was followed by: "For aircraft noise, the 'fraction of a second' over which the maximum level is defined is generally 1/8 second" as determined by the American National Standards Institute in 1988 (nearly 30 years ago). The implication is that we need only to concern ourselves with 1/8 of a second for each FCLP – a truly ridiculous assumption.

It is not clear why different metrics are used for different purposes within the DEIS:

- SEL** is used to analyze the effect of noise on sleep disturbance.
- L<sub>MAX</sub>** alone is used to evaluate the effects of noise on speech interference, with the analysis showing the number of times a student would potentially be unable to hear an instructor in a classroom setting.
- L<sub>eq</sub>** is used to analyze the effect of noise interference in school classrooms. Table 3.2-6 indicates that Coupeville Elementary School, in calendar year 2021 would experience an average of one event per hour with windows open and none with windows closed. However, *this does not include the additional Growlers associated with the proposed action*.
- DNL** is used to recommend land uses that are compatible with aircraft noise levels.

The ambient noise surrounding OLF Coupeville is minimal unless a home is adjacent the highway. "Quiet Rural" daytime and nighttime A-weighted sound levels are missing from Figure 3.2-1.

### D. Classroom Noise

1. Coupeville Elementary School is listed in some of the data analysis while Coupeville [Middle and] High School is included in others. They are less than ¼ mile apart and both should be consistently referenced.

2. The impact on instruction is determined by the number of "hourly events above the 50 dB L<sub>max</sub> level".
  - Provided that all FCLP exercises end at 10 PM, that might be a reasonable analysis – presuming that students are not trying to sleep before 10 PM. Evening and nighttime exercises are likely to result in student lack of sleep, significantly impacting learning. Many families with children live in the Admiral's Cove development which bears the brunt of the majority of OLF Coupeville exercises.
3. No consideration is given to the impact of noise levels on infants, whose ears cannot be protected except by (perhaps) keeping them indoors with the windows closed. These are Coupeville's future students.

#### E. Health Effects

"However, the response to such loud noise is typically short in duration: after the noise goes away, the physiological effects reverse, and levels return to normal. In the case of repeated exposure to aircraft noise, the connection is not as clear. The results of most cited studies are inconclusive, and *it cannot be conclusively stated that a causal link exists between aircraft noise exposure and the various type of nonauditory health effects that were studied* (DNWG, 2013)." [emphasis added]

- It also cannot be conclusively stated that no causal link exists between aircraft noise exposure... There are studies on both sides of this issue.
- Personally, my physiological response is not short in duration.

#### F. Affected Environment

1. Section 3.2.4 indicates: "This section outlines the affected noise environment as modeled for Calendar Year 2021 (CY 21)... however, *it does not include the additional Growlers associated with the Proposed Action.* This allows the noise modeling to isolate the changes to the noise conditions associated specifically with this Proposed Action." The same section states:
  - "The Growler is louder than the P-8A Poseidon and therefore contributes more to the noise environment (i.e., the *Growler is the loudest aircraft currently operating at Ault Field*) (Wyle, 2012). *The flight operations and noise environment at OLF Coupeville are largely the result of Growler aircraft performing FCLP at the OLF.*"
  - Under Scenario A, airfield operations at OLF Coupeville would result in an increase of 29,000 operations during an average year.
  - How can the additional Growlers and the increased operations associated with the proposed action not be included? Does that mean that the DNL contours that "are generally driven by the FCLPs" are incorrect because they do not include the additional FCLPs under the proposals?
  - Section 3.2.7 provides information about sleep disturbances between 10PM and 7AM at "19 POI locations (residences and schools) chosen for analysis." Since it has been implied that only 16% of FCLP operations at OLF Coupeville would occur during that time, the 21% (window open) and 10% (window closed) estimates are significant.
2. Section 3.15.2 Hazardous Wastes. "The Navy is conducting a review of potential historic use of legacy AFFF and release of PFCs at Ault Field and OLF Coupeville to identify possible groundwater impacts. Although there are no specific records that indicate OLF Coupeville used legacy AFFF, it is likely that emergency response equipment was tested at the site; therefore, to address the potential for public exposure to PFCs in groundwater, the Navy is including OLF Coupeville in its investigation. *This investigation is not part of the Proposed Action for this EIS.*"

PFOS and PFOA have now been confirmed to be present at both Ault Field and OLF Coupeville. The Navy's new policy "to remove, dispose, and replace legacy aqueous film forming foam that contains perfluorooctane sulfonate and/or perfluorooctanoic acid" is appreciated.



A strong commitment to eliminate all use, storage and disposal of AFFF-containing materials and to clean existing sites (to the extent that is possible) should be included in the EIS.

G. Public Health and Safety

My greatest concerns in the areas of public health and safety are:

1. The accident potential for the Growlers, as noted in recent incidents reported by the Navy.
2. Water quality for central Whidbey Island, and potentially the entire island due to a shared aquifer, as a result of AFFF-contamination. This concern has now expanded to 1,4-dioxane pollution near Oak Harbor.
3. Noise levels that are at best an annoyance and at worst damaging to hearing and that limit normal home activities, such as being outdoors. "When compared with the No Action Alternative, the action alternatives would result in a 14 to 19 percent increase in the acreage of land within the projected greater than 65 dB DNL noise contours."
4. Section 2.3.3 of Volume II of the DEIS addresses "Potential Hearing Loss: The PHL is also computed per the 2013 bulletin (DOD 2013) as the population average value of NIPTS [Noise-induced Permanent Threshold Shift]. PHL and NIPTS are expressed in dB, applies to several frequencies, and applies only to daily outdoors exposure to noise over 40 years." [emphasis added]

However, readily available research and charts indicate that exposure to loud sounds can damage the cells of the inner ear. Damage can occur with long-term exposure to loud noises, or from a short blast of noise, such as from a gunshot. The National Institute on Deafness and other Communication Disorders (2010) and the National Institute for Occupational Safety and Health (2013) list the following levels in relation to impact on hearing:

Decibels	Noise source
	<b>Safe range</b>
30	• Whisper
60	• Normal conversation
70 to 80	• Washing machine
	<b>Risk range</b>
80 to 90	• Heavy city traffic, power lawn mower
90	• Motorcycle
100	• Snowmobile, hand drill
110	• Chain saw, rock concert
	<b>Injury range</b>
120	• Ambulance siren
140 (pain threshold)	• Jet engine at takeoff
165	• 12-gauge shotgun blast

Noise-induced hearing loss can be caused by exposure to a one-time loud noise, such as an explosion, or to sounds *louder than 85 decibels* over an extended period of time. If you have to shout to be heard... your hearing health is at risk.

It is a serious deficit that the DEIS does not include site-specific noise measurements.

H. Recreation and Wilderness Potential Impacts

1. "With implementation of the Proposed Action, between approximately 33 percent and 43 percent of the 17,000-acre Ebey's Landing National Historical Reserve would be within the greater than 65 dB DNL contours, depending on the alternative selected."

2. "Depending on the alternative and scenario selected, annual aircraft operations would increase approximately 45 percent to 47 percent over affected environment conditions. *These operational conditions would be similar to historic operational levels in the 1970s, 1980s and 1990s for NAS Whidbey Island.*"
  - While the total proposed operations would increase approximately 45-47%, operations at OLF Coupeville could increase 475% [Table 2.3.2: baseline = 6100, proposed maximum = 35,100].
  - In "on the ground" impact, the maximum 35,100 FCLP operations translates to
    - 133 operations per 24-hour day if FCLPs are limited to weekdays and
    - 96 if the operations are scheduled seven days per week, 365 days per year.
  - The noise levels of the Growlers ["the loudest aircraft currently operating at Ault Field"] would be unprecedented.
3. "Recreational users of these areas already experience disruptions that may affect recreational experiences as a result of current operations at OLF Coupeville. The Proposed Action, particularly under Alternatives 1 through 3, Scenario A, *may increase the rate of disruptive noise events at the national historical reserve but would not change the types of operations at OLF Coupeville or other factors that would affect the characteristics of individual noise events.*"
  - To say the proposed action under Alternatives 1-3, Scenario A "may increase the rate of disruptive noise events" is beyond an understatement and closer to a false statement.
  - Use of the Growlers is a significant change to the "types of operations at OLF Coupeville" that does affect the characteristics of individual noise events.
  - Little League and soccer teams using Rhododendron Park require ear protection during FCLP exercises.

I. Property Values

This section affirms that "Economic studies ... have discovered a correlation between noise and the sale price of properties" falling within the range of 0.2 to 2.0 percent per dB, "with the average on the order of 0.5 percent per dB." Using 0.5%, 1% and 2% per dB rates applied to the difference between a baseline of 40 dB at my rural location, the following chart indicates the impact on estimated property value:

dB*	House Value	0.5% of Value	Revised Value @ .5% Loss/dB	1% of Value	Revised Value @ 1% Loss/dB	2% of Value	Revised Value @ 2% Loss/dB
25	\$300,000	\$1,500	\$262,500	\$3,000	\$225,000	\$6,000	\$150,000
30	\$300,000	\$1,500	\$255,000	\$3,000	\$210,000	\$6,000	\$120,000
35	\$300,000	\$1,500	\$247,500	\$3,000	\$195,000	\$6,000	\$90,000

\*dB = difference from "normal 40 dB" to 65, 70, and 75 dB

The potential financial impact of noise above 65 dB is downplayed as "very often small compared to that of non-noise factors." However, as shown in the above table, even using the 0.5% per dB rate, the impact would be significant.

J. Volume II: Aircraft Noise Study for NAS Whidbey Island Complex prepared by Wyle Laboratories, Inc.

Not being a sound engineer, I found Volume II to be mind numbing, and appreciated the summarized data in the DEIS.

Table 1-1 includes the statement "In terms of any of these metrics, the No Action Alternative would have the least amount of increase **but would not likely serve the Navy's needs.**" This is an odd statement to see in a supposedly impartial study.

Wyle Laboratories appears to have overcome incongruent data issues in developing its analysis, as noted in Section 2.1.

Of general note: it is interesting that there has been a noticeable drop in FCLP exercises at OLF Coupeville during this comment period.

Sincerely,



- c: Senators Patty Murray and Maria Cantwell
- Representative Rick Larsen
- Governor Jay Inslee
- State Senator Barbara Bailey
- State Representatives Dave Hayes and Norma Smith
- Island County Commissioners Helen Price Johnson, Jill Johnson and Rick Hannold
- Mayor Molly Hughes, Town of Coupeville



1.a. Thank You  
5.a. Accident Potential Zones

██████████  
██████████  
Coupeville WA 98239  
██████████

February 14, 2017

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508

Attn: Code EV21/SS

**Re: Public Comment #2 – NAS Whidbey Island Complex Draft Environmental Impact Statement / APZ**

To Whom It May Concern:

The purpose of this letter is to note inconsistency between

- the **Draft Environmental Impact Statement (DEIS)** and
- the **2005 AICUZ Study Update for NAS Whidbey Island's Ault Field and OLF Coupeville** (2005 AICUZ Study) found at: <http://docplayer.net/25558206-Aicuz-study-update-for-naval-air-station-whidbey-island-s-ault-field-and-outlying-landing-field-coupeville-washington-final-submission.html> and
- **OPNAV INSTRUCTION 11010.36B** dated 19 December 2002 (OPNAV 36B), found at: <https://www.vbgov.com/government/departments/planning/areaplans/Documents/Oceana/DODInstructionOPNAV1101036Bv2.pdf>, and **OPNAV Instruction 11010.36C** which is referenced in the DEIS.

Review of these documents indicates that the DEIS should include specific language regarding the need for establishing Accident Potential Zones for OLF Coupeville in an updated AICUZ Study, especially since Navy guidelines indicate that each AICUZ should include realistic 5-to 10-year projections of airfield operations when making land use planning recommendations. (OPNAV 36B) The most recent AICUZ for NAS Whidbey was completed in 2005. (The Island County Comprehensive Plan update in December 2016 uses the same AICUZ/APZ map as the 2005 AICUZ study.)

The DEIS mentions Accident Potential Zones (APZs) in several areas, including section 4.3.2.1:

At OLF Coupeville, it was determined during the 2005 AICUZ process that additional APZ coverage was not warranted at that time because operational numbers were below the threshold (approximately 5,000 operations per approach or departure flight track) for the establishment of APZs at that location. Therefore, only Clear Zones are currently present at OLF Coupeville runways. **Based on proposed airfield operations under the three action alternatives, APZs could be warranted at OLF Coupeville (see Table 4.3-1) under some operational scenarios.** APZ development would depend on the alternative selected, and the APZs could resemble the conceptual APZs depicted in Figures 4.3-1 or 4.3-2, based on operational numbers as described above. ... New APZs specific to OLF Coupeville would be recommended through the AICUZ study process and would depend on the alternative selected.

APZs not only could be warranted but **would be required under six of the nine DEIS proposals** for FCLP operations at OLF Coupeville (DEIS Table 4.3-1), and possibly could be required for the remaining three, depending on runway use.

The remainder of this letter substantiates this analysis.

The DEIS, in section 1.6, identifies key documents used as sources of information as:

- 2005 Environmental Assessment for Replacement of Prowler Aircraft with Growler Aircraft at NAS Whidbey Island
- 2012 Environmental Assessment for the Expeditionary Transition of Prowler Squadrons to the Growler at NAS Whidbey Island
- 2008 EIS and 2014 Supplemental EIS for Introduction of the P-8A Multi-Mission Maritime Aircraft into the U.S. Navy Fleet
- 2014 Environmental Assessment for Pacific Northwest Electronic Warfare Range
- 2015 EIS for Military Readiness Activities at Naval Weapons Systems Training Facility Boardman

**but omits** (while referencing at page 4-116) the 2005 AICUZ Study Update for NAS Whidbey Island's Ault Field and OLF Coupeville.

This is critically important for the following reasons.

The DEIS proposes three alternatives and three scenarios for each alternative, in which projected FCLP operations at OLF Coupeville range from

- 8,700 (minimum) to
- 35,500 (maximum).

The 2002 OPNAV 36B states on pages 10 and 11:

- (b) Accident Potential Zone I (APZ-I) APZ-I is the area beyond the clear zone which still possesses a measurable potential for accidents relative to the clear zone. **APZ-I is provided under flight tracks which experience 5,000 or more annual fixed wing operations (departures or approaches, but not both combined).** ...
- (c) Accident Potential Zone II (APZ-II) APZ-II is an area beyond APZ-I (or clear zone if APZ-I is not used) which has a measurable potential for aircraft accidents relative to APZ-I or the clear zone. **APZ-II is used whenever APZ-I is required.** If APZ-I is not warranted, APZ-II may still be used if an analysis indicates a need for it. In this case, rationale shall be provided for use of APZ-II and it shall be configured as shown on Figure 1, next to the clear zone. ...

Sections 4.b.(2) and 4.b.(3) of OPNAV 36C reiterate these instructions.

And on page 12 of OPNAV 36B: "Hence, it is imperative that AICUZ Studies consider not only current but also realistic 5-to 10-year projections of airfield operations when making land use planning recommendations."

Section 4.a.(3) of OPNAV 36C states:

DoD fixed-wing runways are separated into two classes for the purpose of defining accident potential areas. Class A runways are used primarily by light aircraft and do not have the potential for intensive use by heavy or high performance aircraft. Typically, these runways have less than 10 percent of their operations involving heavier aircraft and are usually less than 8,000 feet long. Class B runways are all other fixed-wing runways. ...

**OLF Coupeville's runway 14/32 is 5,400 feet long and is used by fixed-wing, high performance aircraft.**

The 2005 AICUZ Study, in table 3-3, projects CY 2013 EA-18G FCLP operations as **6,120**. The source of this information is Wyle Laboratories "Report 94-13 Aircraft Noise Study for NAS Whidbey Island OLF Coupeville Washington 1994."

- It was therefore anticipated in 1994 and reaffirmed in 2005 that approximately **6,120** FCLP operations would occur in OLF Coupeville by 2013.
- According to summary data in the DEIS (page 1-6), in 2011 and 2012, closer to **10,000** FCLP operations occurred, likely exceeding the 5,000 or more operations threshold in *OPNAV 36B and 36C*.

The 2005 AICUZ Study also states (following Table 4-5): "At OLF Coupeville, the 1986 AICUZ document also showed APZ-Is that reflected the FCLP patterns of the time. While FCLP patters (*sic*) will continue to exist at OLF Coupeville, **numbers of operations are currently projected to fall below the current level for establishment of APZ I or II at this location and therefore are not depicted.**"

- Although the 6,120 projected FCLP operations could have fallen below the 5,000 threshold (due to use of runways), the threshold certainly must have been met in 2011 and 2012, when there were closer to 10,000 operations.

The final Environmental Impact Statement should clearly state that, under *OPNAV 36C*, an updated AICUZ is overdue and would require APZs to be developed for:

1. Alternative 1, Scenarios A and B
2. Alternative 2, Scenarios A and B
3. Alternative 3, Scenarios A and B

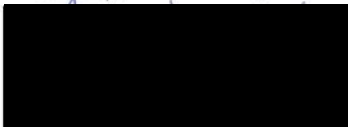
and possibly require APZs under Scenario C in Alternatives 1, 2 and 3 – depending on runway use.

The final Environmental Impact Statement should revise statements minimizing the need for accident potential zones (including on page 4-119: "If APZs are created, they *could* influence future land use decisions by the community and *may have a minor impact* on the land under the APZs.") to acknowledge:

- the many homes in the Admiral's Cove area and elsewhere that will be within the APZs, and
- the historical impact of designating APZs on land value and use.

To sidestep the need for an updated AICUZ, to use passive language, and to focus the responsibility for identification of APZs on the local community is disingenuous.

Sincerely,



- c: Senators Patty Murray and Maria Cantwell  
 Representative Rick Larsen  
 Governor Jay Inslee  
 State Senator Barbara Bailey  
 State Representatives Dave Hayes and Norma Smith  
 Island County Commissioners Helen Price Johnson, Jill Johnson and Rick Hannold  
 Mayor Molly Hughes, Town of Coupeville

- 1.a. Thank You
- 2.a. Purpose and Need



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

- 1. Name [REDACTED]
- 2. Organization/Affiliation \_\_\_\_\_
- 3. Address Port Townsend, WA 98368
- 4. E-mail [REDACTED]
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

These are tremendously sensitive times, the environment is taxed like never before, we are the people who live here, we are the earth, we are the taxpayers. We are responsible for long range vision a world focusing resources on peace or environmental clean-up & preservation of a healthy planet. Does this meet that criteria or one of control & profit? Who benefits, who does not? Please redirect our collective consciousness towards these things.

Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**



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I implore my government, who represents us, to stop these endeavours of war & redirect our tax money to nuclear clean-up, water clean-up, & the welfare of the earth & her inhabitants. We are choosing our future & this is more than a waste of money & resources. It has profound potential to keep the studies & focus on WAR. Lets create the world we really want! Lets take care of each other & the world! This is in part my money & therefore my responsibility as a citizen to say! Now, more than ever, please stop this nonsense & begin to plan a better future. Thank you for reading these words.

For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

**Please print**

**Please drop this form into one of the comment boxes here at the public meeting or mail to:**  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Friday Harbor, WA 98250

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Friday Harbor, WA 98250

1.a. Thank You

4.r. Nonauditory Health Effects

Please: the Growlers are destroying the reason I moved out here. Furthermore, when they started up I developed an autoimmune disease, which cleared up (with prednisone) when they stopped for a while. As they've started up again, I have had an increase in medical problems.

Environmental Impact Statement Comment Form  
EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by February 24, 2017  
SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name [Redacted]  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
3. Address [Redacted]  
4. Email [Redacted]

*Coupeville WA  
98239-9597*

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 12.o. Cost-Benefit Analysis
- 15.a. Infrastructure
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I am, of course, concerned about every point above, but this is specifically as to what the Navy is costing Island County. We hear all about what the Navy brings but what about the costs: drop in property values; use of infrastructure (wear & tear); costs of health care due to hearing issues + anxiety due to noise. Also, the costs of people w/ home businesses who cannot be on the phone, or conference calls, or be to face meetings, because of the actual (not modeled) noise.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



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1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_

3. Address \_\_\_\_\_ *Coupeville WA 98239*

4. Email \_\_\_\_\_

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- A decrease in private property values due to noise.

(over)

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- 2.f. Use of Public Comments
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- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

Because there was no mapping of the APZ in the DEIS, it is impossible to comment on them. And since we will not be able to comment on the final EIS, this is a great problem for those of us concerned about this area.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military) \_\_\_\_\_

3. Address \_\_\_\_\_ *Coupeville WA 98239*

4. Email \_\_\_\_\_

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**Comments**

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- A decrease in private property values due to noise.

(over)

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- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquifer and well contamination.

## Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island *and the Country (as in Pearl Harbor)* by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

## Please include any additional comments and concerns here:

I am particularly concerned that the current OLF is below the standards for training - not a real B airfield. And that the DEIS DOES NOT delineate the APZs. ALSO, THERE ARE MANY SITES around the country (Nevada, Texas, California) where safe and excellent training is available - and the areas much less populated.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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 By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Resident, citizen*

3. Address [REDACTED] *Coupeville WA 98239*

4. Email [REDACTED]

*Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.*

### Comments

Please check all that concern you and include additional comments on the back.

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- A decrease in private property values due to noise.

(over)

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- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.

**Additional Concerns:**

- Risk of increased aquifer and well contamination.
- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife such as orcas and migratory birds.
- The major terrorist risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as the Growler onboard oxygen system.

**Please include any additional comments and concerns here:**

I am not anti-military. And I am willing to share the burden of all I have checked off in this form. But the Navy is asking me to take on more than my fair share. The Navy negated several other air strips w/in a 50 mile radius - there are others all around the country that are suitable. If the Navy applied the same criteria to the OLF, it too would be negated. I want to enjoy living here. I am 74 and want to enjoy my home. I provide me with income for my future.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

As an individual concerned for the health and well-being of my fellow citizens, I am compelled to send my written input to you regarding the increasing noise levels that would become a frequent disruptive influence to all living creatures dwelling near the flight pattern of the Growlers.

The new analysis states that it was conducted at the request of the state Board of Health and the Island County Public Health Department. However- the Island County Board of Health passed, (in a 3-2 vote), a resolution stating that no action was to be taken since there are no facts "to demonstrate causation between jet noise and individual health concerns."

I have served as a School Nurse and as a substitute teacher for many years, as well as having certification as an Early Childhood Learning Specialist. I have frequently observed infants and young children reacting to the effects of loud noises- and many red flags are going up for me.

Sleep, feeding/appetite, concentration, behaviors and ability to absorb new learning skills are all detrimentally effected by excessively loud or frequent exposure to noise at the levels we anticipate occurring in our area.

My observations directly and profoundly contradict the Navy's claim that there is no link between military jet noise and health.

I respectfully implore you to research more completely, as I strongly insist that studies will clearly find a causal and significant relationship between aircraft noise, learning process and health."

Sincerely,

  
Advanced Family Nurse-Practitioner-  
Retired

Bow, WA 98232

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

Bow, WA 98232

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Bow, WA 98232

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

Bow, WA 98232

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.



Bow, WA 98232

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

Bow, WA 98232

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Bow, WA 98232

1.a. Thank You  
4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)

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3. Address [REDACTED] *Coupeville Wa 98239*

4. Email [REDACTED]

**Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.**

**Comments**

**Please check all that concern you and add additional comments on the back.**

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 10.b. Biological Resources Impacts
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.d. Arrivals and Departures
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.b. Overtasking/Overloading of Air Traffic Control at Ault Field and Elsewhere

- Outdoor recreation limits, as well as children’s and family’s health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy’s prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

*All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.*

**For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)**

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

Victoria, British Columbia V8S 3E8

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

Please stop your very disrupting air flights over Victoria BC. The terrible noise from your Growlers prevents my family from sleeping and creates much anxiety. We are pacifists and do not believe in military exercises. We think that the government of Canada ought to prohibit the use of its airspace by the American armed forces.

1.a. Thank You

Saanich BC, British Columbia V8z2y9

The sound of the jets do not bother me at all. Yes I hear them once in awhile. To me that is the sound of freedom. I like having that kind of fire power next to me that would also protect us here in Canada. Make all the noise you like.

Langley, WA 98260

I am deeply concerned about the projected increase of Growler activity on Whidbey Island. Many of us have moved to Whidbey because of the quiet, island environment. I have experienced the middle-of-the-night flights while camping at Deception Pass and have never been so terrified in my life. I was horrified that what I expected to be a peaceful evening in nature turned out to be a scary, horrifying evening. We citizens deserve better. Please move the Growler tests to an area away from where so many people live and enjoy nature.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.p. Sleep Disturbance



Coupeville, WA 98239

1.a. Thank You  
12.h. Tourism  
12.n. Quality of Life

We have a unique area, our Island. We welcome many tourists, campers, hikers, the soccer camps, the fisherman and boaters all come to enjoy this special place. I don't believe that you, the Navy, has a right to come in and turn our communities into a large increase in flights area. You have been welcomed here for many years but to turn our communities into a place that people will no longer come back to is unconscionable and uncaring about a community that you have been a part of for so many years.

1.a. Thank You

Coupeville, WA 98239

To add 36 more Growlers is unreasonable. To turn our communities into that terrible noise day in and day out is just plan wrong. We do not want that to happen. They fly right over my house.

Coupeville, WA 98239

We are in a fly zone for so many birds...what will be the impact on those creatures? We have no idea until it is done and too late to bring back our wild life.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.l. Bird Migration
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Coupeville, WA 98239

It is a major security risk to have all those Growlers in one area. I lived near Bay Cit, Tx. we all knew that the oil refinery would be hit as a target in case of war.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

Coupeville, WA 98239

1.a. Thank You  
12.j. Property Values

My husband was in the Navy. We support the flights and have lived here for 17 years. The number of flights that are purposed will cause our property values to decrease. This is the money that is going to be used for a retirement place for me now that my husband has died. This is not right to hurt all of us that have supported to Navy for so many years.

1.a. Thank You

Coupeville, WA 98239

I live right in the fly zone and have for 16 years. We knew about this when we bought our home. But the increase in flights will cause us distress. The noise day in and day out will be awful. We have supported the Navy through the years but this is just wrong to do this to our rural community.

Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
7.j. Impacts on Outdoor Sports

I am concerned about the children in the school and the effect that the noise will have on them. The increase in flights will interfere with their school work and their outside activities.

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

The well contamination is of great concern. I think that the children that have been drinking that water since they were born should be tracked to see if the perfluorinated chemical compounds have in any way caused these children to have medical problems that can be traced to this chemical that they have been drinking for years. a study should be done to check on this.



Coupeville, WA 98239

- 1.a. Thank You
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss

As an older woman with hearing problems it is of great concern to me that our children in the elementary, jr. high and senior high will be exposed unnecessarily to having their hearing impaired by the flights day in and day out over their school.

Friday Harbor, WA 98250

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

Thank you for the opportunity to comment. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Friday Harbor, WA 98250

Thank you for the opportunity to submit comments. The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

Friday Harbor, WA 98250

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Thank you for the opportunity to submit comments. The DEIS claim that the JGL noise study was "flawed" is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

Friday Harbor, WA 98250

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.

Friday Harbor, WA 98250

1.a. Thank You

4.r. Nonauditory Health Effects

Thank you for the opportunity to submit comments. Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Friday Harbor, WA 98250

1.a. Thank You

4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month").

Friday Harbor, WA 98250

1.a. Thank You  
7.c. Noise Disclosure

Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.



Friday Harbor, WA 98250

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Friday Harbor, WA 98250

1.a. Thank You

13.a. Environmental Justice Impacts

Thank you for the opportunity to submit comments. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Friday Harbor, WA 98250

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Friday Harbor, WA 98250

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

Friday Harbor, WA 98250

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Friday Harbor, WA 98250

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

Friday Harbor, WA 98250

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Friday Harbor, WA 98250

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.



Friday Harbor, WA 98250

To Whom It May Concern: I am writing you about noise from jets on Whidbey Island. The roaring from these jets is deeply unsettling and inescapable. Whether the roaring is distant or nearby, it creates an immediate and deep sense of unease and alarm. Often the noise is felt as a bodily sensation as much as heard. This is a dreadful sensation, a shattering from within. Many of us who live in San Juan County moved here out of love for, and commitment to, the natural environment. The jet noise overwhelms all other sounds in the environment and destroys all peace in the environment. Listening to and enjoying the meaningful sounds of the surroundings is no longer a regular part of working outside or simply being outside, jet noise overwhelms all other sound. The native animal population relies heavily on meaningful acoustic information from the environment, the jet noise overwhelms all other sound. I've heard many tourists say that the jet noise ruined their time on the islands. Friends who visit from elsewhere are incredulous that the noise and disturbance from the jets is permissible, they comment that the noise and concomitant unease completely alter the experience of being in the islands. The jet noise overwhelms all indoor sounds as well, and is as destructive to daily life indoors as it is outdoors. Ordinary indoor sounds are drowned out by jet noise. Trying to mask jet noise with something like nice music is useless, the jet noise overwhelms all other sound. Sometimes the jets fly late into the night, sometimes early in the morning, ruining rest and sleep. Studies about noise in the environment are ongoing and current. Scientific findings support and confirm individuals' experience of the very harmful effects of noise on health and well being. Scientific findings make clear the vital importance of sound in healthy ecosystems. It is wrong to allow noise of this sort to destroy quality of life. Please take immediate and forward-looking steps to form proactive policy concerning noise in the environment. Sincerely, [REDACTED] Friday Harbor

- 1.a. Thank You
- 1.d. General Project Concerns
- 10.c. Wildlife Sensory Disturbance and Habituation
- 12.h. Tourism
- 2.h. Next Steps
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

1.a. Thank You

Clinton, 98236

My husband and I have lived on Whidbey for 50+ years and have thoroughly enjoyed watching the jets do their touch and go at the field. They make us feel very safe if anything would happen on the Island. We consider the jets our sound of freedom.

Victoria, British Columbia V8S 5E9

The need, as expressed in Whidbey Island EIS is: "The Navy needs to effectively and efficiently increase electronic attack capabilities in order to counter increasingly sophisticated threats and provide more aircraft per squadron in order to give operational commanders more flexibility in addressing future threats and missions." With all respect, this expressed need is entirely abstract and borders on the delusional. Given that the degree to which the current level of Growler activity creates an aggressive and disruptive acoustic impression that extends all the way across the water to the Oak Bay region of Victoria, where I live, I heartily encourage that you adopt option 2.3.1 No Action Alternative. If the disruption and disturbance is felt as far away as this I can barely image how intensely it is experience near the source. Not only be people, but animals — domestic and wild — as well as creatures in the sea. This can only be an agitating experience. Some defend the intrusion as the sound of "freedom." This is a rhetorical diversion. The issue is about noise impact not someone's subjective construction of "freedom." Your environmental papers are detailed and obfuscating for the ordinary person. I frankly do not know how to begin to wade through the verbiage, the graphs, the tables, with no clear-spoken summary in sight. What I do go by is my experience of the noise level at its current rate, and what I have read elsewhere about the impact of noise on the aquatic environment as well as the peace of mind for humans and animals on land. There would not be this controversy if people did not feel negatively impacted by this project. I think that in itself speaks volumes. The current levels are disturbing enough. Adding to them will only increase that disturbance and for what? We sacrifice our daily peace-of-mind for a projected conflict in the someone's idea of the future. I would suggest more money and effort go into diplomat relations with other countries and more energy spent on how to keep the peace rather than how to win an imaginary war. This has the low growling tones of "Dr Strangelove" running through it. And that is frightening.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 2.a. Purpose and Need
- 2.c. Compliance with the National Environmental Policy Act
- 2.I. No Action Alternative
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

1.a. Thank You  
19.d. Electronic Warfare

Sedona, AZ 86336

No more Growler noise at the Olympic Peninsula! Not even 10% more. No war games either. No electronic mobile emitters in the ONF.

Sedona, AZ 86336

The Draft Environmental Impact Statement (DEIS) misrepresents the impacts of Growler noise. No measurements of noise were taken in communities. Instead, the Navy used computer modeling that averaged periods of noise with long period of silence. The DEIS ignores overwhelming scientific and medical evidence of harms caused by hazardous Growler noise. It presents no evidence that those harms are not now occurring and will not occur in the future. ALL of the alternatives for Growler operations proposed by the Navy will create more noise and harms in communities throughout the Puget Sound. The DEIS's alternatives only shift the burden of harms between communities.

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.r. Nonauditory Health Effects

Reno, NV 89512

I'm a believer in military training, but this is insane. The Olympic National Park is a natural wonder and a monument for all Americans. Closures of the park so the Navy can conduct war games defeats what the military is supposed to be protecting. Residents including Native Americans would be impacted to an even greater degree. This is truly one of those situations that make you wonder what planet the originators of this plan are living on. It surely isn't residents and visitors to the Olympic coast.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

19.d. Electronic Warfare

7.d. Recreation and Wilderness Analysis and Study Area

**Draft Environmental Impact Statement Comment Form***EA-18G Growler Airfield Operations at NAS Whidbey Island Complex***Comments must be postmarked or submitted online by January 25, 2017**Online at: [www.whidbeyeis.com](http://www.whidbeyeis.com)By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name \_\_\_\_\_
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military) \_\_\_\_\_
3. Address *N.A.* \_\_\_\_\_ *Coupeville, VA*
4. Email \_\_\_\_\_
5. Phone \_\_\_\_\_
6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

**Comments**Check all that concern you. For additional information see [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

- Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations by 36 % to 475%, with up to 135 flight operations daily, will double the residential areas and increase by 10-fold the commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**
- Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.
- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

(over)

- 1.a. Thank You  
 1.e. Risk of Terrorist Attack  
 11.d. Per- and Polyfluoroalkyl Substances  
 12.e. Agriculture Analysis  
 12.h. Tourism  
 12.i. Housing Access and Affordability  
 12.j. Property Values  
 12.m. Education Impacts  
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 2.n. Alternatives Considered But Eliminated  
 4.o. Classroom Learning Interference  
 4.r. Nonauditory Health Effects  
 5.a. Accident Potential Zones  
 5.d. Environmental Health Risks and Safety Risks to Children  
 7.a. Regional Land Use and Community Character

- The Navy did not adequately look at siting new Growler aircraft elsewhere, despite this being the #1 request from the community during the Navy's prior scoping forums.
- An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.
- Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries. All active electronic warfare jets in the US Military would be at NASWI.
- The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia, with over 100 incidents in all F/A-18 airframes in 2015 alone. Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Please include any additional comments here:

## What else you can do

1. **Get involved.** To volunteer, email us: [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
  - a. U.S. Senator Patty Murray: 206.553.5545; [www.murray.senate.gov](http://www.murray.senate.gov)
  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

## To Learn More

- ✓ To receive email updates, or to get involved, **email us at** [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at [www.whidbeyeis.com](http://www.whidbeyeis.com)

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.



Portland, OR 97219

I am concerned with the environmental impacts of these planes on Whidbey Island AND as part of proposed war games on the Olympic Peninsula. FIRST, please think long term. The planet does not need nor can it likely survive have hundreds of jets each produce 12.5 metric tons of CO2 for hours on end. The local population (human, animal, avian) cannot withstand 150 decibels of sound on a regular basis, though I suppose the consequent human hearing loss might be a boon to those who teach American Sign Language. SECOND, for heaven's sake, neither national parks nor traditional Native lands are the place for war games. The National Park Service Organic Act, signed in 1916, states the mission of the parks as, "To conserve the scenery and the natural historic objects and wild life therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them UNIMPAIRED for the enjoyment of future generations." War games would seem to violate that purpose. THIRD, though I expect you don't care much about birds, since the Navy conducted numerous sonar exercises to the detriment of whales, this will affect thousands of birds along the Pacific flyway. They actually share our life on this planet. I cannot imagine that I will be any safer for the presence of Growlers and the practice of war games. Given the significant environmental damage planes and games will cause, I urge you not to pursue them.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.l. Bird Migration
- 10.m. Impacts to Marine Species and Habitat
- 18.b. Average Carbon Dioxide per Aircraft
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area
- 9.a. Consideration of Tribes

Coupeville, WA 98239

I support our armed services and locally our Navy! I do not support the concentration of Growlers here on Whidbey Island. Noise, pollution, and environmental concerns are all part of my objection. It is unfair for the citizens of this area to have to cope with the many ramifications of more growlers. Currently the existing operations are very disturbing. Children in schools must stop instruction during the noise then resume after it is quiet. This is very time consuming for our schools. I would like to see the impact on our local farmers on whom we depend for local food. Wild life habitats are also a concern - marine life, birds all will be affected by this move. I vote no. Living close to an airfield does not mean I must live with the noise and pollution created by these growlers. I do love the Navy and expect them to keep me safe but not at the expense of my health and quality of life.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation CITIZEN HOME OWNER

3. Address [REDACTED] COUPEVILLE WA 98239

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

YES NAVY NO GROWLER

I WANT A MORE CURRENT STUDY OF NOISE USING A MORE CURRENT TYPE MEASUREMENT TOOLS.

PUT A MUFFLER ON THE AIRCRAFT.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.t. Noise Mitigation

Freeland , WA 98249

I am very concerned about this great increase in the number of Growlers and Navy personnel and families to be located to Whidbey Island. My first concern is the environmental impact, not just the increased noise locally but also these impacts to the whole area, including the Olympic peninsula. The Hoh Rain Forest is a national treasure and must NOT be impacted with the noise of jets. It has been determined to be one of the quietest places on earth but that will be no more if jets fly nearby. I have talked with a Navy pilot who admits that for variety of reasons these young pilots may not stay within the designated flight area, so the whole area is subject to impact. My other great concern is the impact upon housing. There is already lack of sufficient housing on Whidbey Island so moving so many Navy families to our location will greatly exacerbate the situation. The Navy is not acting responsibly by expecting the community to provide the needed housing; that should be the role of the Navy to do so. Rents are increasingly out of reach for Island residents and it is unfair for them to be forced out of their homes due to the newcomers who will only help rent prices go up due to lack of supply. In summary, Whidbey Island is being asked to bear too great a cost to our housing, social services, and environment. Please consider all of the comments being submitted by Whidbey residents. I am opposed to this Navy expansion on Whidbey Island. Our geographic area and resources are small and the proposed impact will be very great.

- 1.a. Thank You
- 12.i. Housing Access and Affordability
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.h. Next Steps
- 3.a. Aircraft Operations
- 7.d. Recreation and Wilderness Analysis and Study Area

Langley, WA 98260

Please respond to the concerns outlined by the Sustainable Economy Collaborative in their recent report "Invisible Costs: The \$122 Million Price Tag for The Naval Air Station Whidbey Island." You may find that report here:

<https://sustainable-economy-collaborative.com/report/> Directly in regard to the operation and proposed expansion of the Growler Airfield Operations at Naval Air Station Whidbey Island, please refer to pages 22-32 in the section III., "External Costs." These costs include and are not limited to: - Health effects - Reduced Property Values - Risk of catastrophic accident - Toxic releases, such as recent well contaminations by PFAS's - Injury to local tourist economy Unless the methodology of this report can be demonstrated illegitimate, then this report ought to be incorporated into the Final EIS. While this report is detailed, it still leaves many concerns out, including the impact of noise on wildlife and the cascading ecological effects. For one example, refer to the documentary "Sonic Sea" ([www.sonicsea.org](http://www.sonicsea.org)) for impacts of noise on the marine environments. The Whidbey Island community will from this point forward pressure the Navy to be accountable for its impacts at every turn and as publicly as possible. The current draft EIS is a clear and blatant forfeit of duty by failing to document actual impacts that the "Invisible Costs" report demonstrates are readily documentable. Please do not continue to abuse your position of power and forfeit your primary duty to this community, the citizens our military is there to serve. Thank you for incorporating these evidence-based concerns into the Final EIS,"

1.a. Thank You

10.c. Wildlife Sensory Disturbance and Habituation

12.b. Invisible Costs

2.b. Scope of the Environmental Impact Statement and Analysis Conducted

2.c. Compliance with the National Environmental Policy Act

1.a. Thank You  
12.n. Quality of Life

Victoria, British Columbia V8S 5C7

I live in Oak Bay in Victoria, BC Canada. The noise from the growlers on Whidbey Island is already impacting my enjoyment of my neighborhood through noise pollution from the jets. There should be total elimination of the flights out of Whidbey rather than increased flights.



# Public Meeting Comment Form

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1. Name [REDACTED]

2. Organization/Affiliation *member of the human race + USA citizen*

3. Address *Port Townsend*

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

1. *I am opposed to increased funding and expansion of out military at a time when we are already the most dangerous and armed country in the world, and at the same time the economic, educational, health-related and social needs of US citizens require more attention, support and funding. If we truly are to remain as a beacon of democracy for the entire world. Think about it. "Hatred never ceases by hatred, but by love alone is transformed. This is the ancient and eternal law."*

2. *While I believe all life is sacred, I also believe we all require places of silence and solitude where clarity about life's*

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 12.h. Tourism
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.j. Costs of the Proposed Action
- 4.j. Other Reports
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 9.a. Consideration of Tribes

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

purpose emerges. Literature and scientific data attest to the universal joy and wonder people experience in the natural world. Keep wild places wild. No military incursions into National Parks. Spend more time and \$\$ increasing heritage sites and protecting pristine wilderness areas. And consider always: give priority to quality of life issues for all citizens of the United States of America and honor all treaties signed with indigenous nation

3. Our identity here on the Olympic Peninsula is completely and irrevocably entwined with the physical beauty that surrounds us. It is now the economic driver of the region. The increase in militarization and these current proposals will have huge negative impacts on all local economies.

4. Please put more thought into protecting all life and our beloved Mother Earth. We are at a critical junction where smart, intelligent, and caring decisions need to be made. Use the ideas put forth by local citizens. We are all connected and have never been separate.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**



Port Townsend, WA 98368

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

I attended the public meeting in Port Townsend on December 5th and submitted comments, but several neighbors and friends were away from home during that time and need to be updated about the seriousness of these issues. I respectfully request that the period for submitting comments be extended for at least another month to allow for more participation from citizens who are away for winter holidays.

Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

1. First Name [Redacted]

2. Last Name [Redacted]

3. Organization/Affiliation Citizen of USA

4. City, State, ZIP Lopez Island WA 98261

5. E-mail [Redacted]

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

The enclosed comments express my concerns — [Redacted]

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

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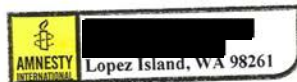
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Coupeville, WA 98239

My partner and I decided to move to Coupeville to raise our family mainly due to the fact that it is a historical reserve where we can raise our family and experience one of the oldest towns in WA state as well as live in a preserved area. Increase in outlying field operations will completely eliminate the part of historical preserve that tells the story of the wars in the past not to mention the health effects from the noise and low-frequency sounds. Property value will drastically decrease which will create another round of home owners mortgage underwater. Given the significant negative impact it has, we hope that the committee can consider what the most ironic part of this action is that the military (Navy) who is defending the American value is ruining it by taking a historical preserve and making it a crash site which destroys all the American families along the way. We strongly feel that this will only do permanent damage to this area.

1.a. Thank You  
12.j. Property Values  
4.r. Nonauditory Health Effects  
5.a. Accident Potential Zones  
8.c. Noise and Vibration Impacts to Cultural Resources  
8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

Anacortes, WA 98221

I do NOT agree a significant increase of Growlers at the Whidbey Island base. We on Fidalgo Island already are maxed out with the amount of noise pollution from this naval air base. If it bothers me to the point that conversation halts and one needs to plug one's ears, what is happening to our wildlife in the area? Our sleep is disturbed and a common complaint is ,wow did you get any sleep with all the NAS whidbey planes???? There is major "growling " on the citizen's part that you inflict. PLEASE NO MORE!!!!!!

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Port Townsend, WA 98368

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

1.a. Thank You

Port Townsend, WA 98368

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.



Port Townsend, WA 98368

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts.

Port Townsend, WA 98368

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Port Townsend, WA 98368

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

1.a. Thank You

4.q. Potential Hearing Loss

Port Townsend, WA 98368

1.a. Thank You  
7.c. Noise Disclosure

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Port Townsend, WA 98368

The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs to a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Port Townsend, WA 98368

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Port Townsend, WA 98368

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment.

Port Townsend, WA 98368

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo



Port Townsend, WA 98368

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Port Townsend, WA 98368

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

Port Townsend, WA 98368

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Port Townsend, WA 98368

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

SEQUIM, WA 98382

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

SEQUIM, WA 98382

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

SEQUIM, WA 98382

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

SEQUIM, WA 98382

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts.



SEQUIM, WA 98382

1.a. Thank You  
4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

SEQUIM, WA 98382

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

SEQUIM, WA 98382

1.a. Thank You  
7.c. Noise Disclosure

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

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The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs to a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

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1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

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Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment.

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The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

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1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.



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The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

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1.a. Thank You

4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

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1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

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Water contamination to sole--source aquifer is not adequately addressed in the DEIS. o Actual noise measurements were not made. Noise modeling is outdated & noise averaging inappropriate. Individual measurements made by the National Park Service show noise levels far in excess of that predicted by average modeling. o Alternatives to using the Coupeville OLF were not adequately addressed. o Jet noise reduction options are not thoroughly considered. o Crash frequency and impacts are not addressed. o Impact on our Children is not adequately addressed: Childhood learning disability & hearing damage; Impact on students at Coupeville Schools; Impact on children (as well as parents and coaches) playing ball at Rhododendron Park. o Economic impact on tourism, property value loss, decline of population, & loss of businesses is not addressed adequately. o Impact to natural resources is not addressed: bird migration and animal habitat; impact on Ebey's Landing National Historic Reserve, as well as all aspects of outdoor recreation. o Frequency and effects of fuel dumping not addressed.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve

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1.a. Thank You  
4.e. Day-Night Average Sound Level Contours and Noise  
4.l. Points of Interest

Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

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2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN\\_122916--2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN_122916--2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental--review/noise--abatement--and--control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

1.a. Thank You

8.a. Cultural Resources Area of Potential Effect

8.c. Noise and Vibration Impacts to Cultural Resources

8.j. City of Port Townsend Cultural Resources

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- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 2.d. Program of Record for Buying Growler Aircraft

Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact."

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1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water.



1.a. Thank You  
19.d. Electronic Warfare

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5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews."

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1.a. Thank You  
2.e. Public Involvement Process  
2.h. Next Steps

6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts.

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There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." (<https://energy.gov/sites/prod/files/G--CEQ--40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities.

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

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- 1.a. Thank You
- 2.h. Next Steps
- 2.m. Record of Decision/Preferred Alternative

The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative.

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. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.i. Proposed Action
- 4.f. Noise Measurements/Modeling/On-Site Validation

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The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

4.f. Noise Measurements/Modeling/On-Site Validation

4.i. Points of Interest

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The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.m. Supplemental Metrics

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Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.i. Other Noise Metrics Not Currently in Analysis

4.m. Supplemental Metrics



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1.a. Thank You  
4.m. Supplemental Metrics

The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers.

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The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible. (<https://www.serdp--estcp.org/Program--Areas/Weapons--Systems--and--Platforms/Noise--and--Emissions/Noise/WP--1304>)

1.a. Thank You

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

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The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 4.a. General Noise Modeling

1.a. Thank You  
4.t. Noise Mitigation

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New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control.

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- 1.a. Thank You
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations

Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed.

- 1.a. Thank You
- 4.m. Supplemental Metrics

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Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed.

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Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets.

1.a. Thank You

12.k. Compensation to Citizens for Private Property

4.t. Noise Mitigation

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No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful.

1.a. Thank You

2.c. Compliance with the National Environmental Policy Act



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- 1.a. Thank You
- 3.d. Arrivals and Departures
- 5.a. Accident Potential Zones

The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period.

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances

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Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant.

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances

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. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical--&--Material--Emerging--Risk--Alert--for--AFFF.pdf>)

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- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances

No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water.

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Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted.

1.a. Thank You

10.a. Biological Resources Study Area

10.b. Biological Resources Impacts

10.f. Endangered Species Impact Analysis Adequacy

19.h. Cumulative Impacts on Biological Resources

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 19.h. Cumulative Impacts on Biological Resources
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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1.a. Thank You  
1.b. Best Available Science and Data  
19.d. Electronic Warfare

Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test.

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Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

1.a. Thank You

4.e. Day-Night Average Sound Level Contours and Noise

4.i. Points of Interest



SEQUIM, WA 98382

Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN\\_122916--2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN_122916--2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental--review/noise--abatement--and--control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

1.a. Thank You

8.a. Cultural Resources Area of Potential Effect

8.c. Noise and Vibration Impacts to Cultural Resources

8.j. City of Port Townsend Cultural Resources

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- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 2.d. Program of Record for Buying Growler Aircraft

Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact."

SEQUIM, WA 98382

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water.

1.a. Thank You  
19.d. Electronic Warfare

SEQUIM, WA 98382

The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews."

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- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.h. Next Steps

The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts.

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There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." (<https://energy.gov/sites/prod/files/G--CEQ--40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative.

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated

SEQUIM, WA 98382

The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.i. Proposed Action
- 4.f. Noise Measurements/Modeling/On-Site Validation

SEQUIM, WA 98382

The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

4.f. Noise Measurements/Modeling/On-Site Validation

4.i. Points of Interest



SEQUIM, WA 98382

The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.m. Supplemental Metrics

SEQUIM, WA 98382

The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdp--estcp.org/Program-->

[Areas/Weapons--Systems--and--Platforms/Noise--and--Emissions/Noise/WP--1304](https://www.serdp--estcp.org/Program--Areas/Weapons--Systems--and--Platforms/Noise--and--Emissions/Noise/WP--1304)) 15.

The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them.

1.a. Thank You

1.c. Segmentation and Connected Actions

19.a. Scope of Cumulative Analysis

19.b. Revised Cumulative Impacts Analysis

4.a. General Noise Modeling

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

4.m. Supplemental Metrics

1.a. Thank You  
4.t. Noise Mitigation

SEQUIM, WA 98382

New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control.

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- 1.a. Thank You
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations

Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed.

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Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful.

- 1.a. Thank You
- 12.k. Compensation to Citizens for Private Property
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation

SEQUIM, WA 98382

The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable.

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 3.d. Arrivals and Departures
- 5.a. Accident Potential Zones

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

SEQUIM, WA 98382

Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant.

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances

SEQUIM, WA 98382

Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical--&--Material--Emerging--Risk--Alert--for--AFFF.pdf>)



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- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances

No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water.

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Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 19.h. Cumulative Impacts on Biological Resources
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

SEQUIM, WA 98382

Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

SEQUIM, WA 98382

Water contamination to sole--source aquifer is not adequately addressed in the DEIS. o Actual noise measurements were not made. Noise modeling is outdated & noise averaging inappropriate. Individual measurements made by the National Park Service show noise levels far in excess of that predicted by average modeling. o Alternatives to using the Coupeville OLF were not adequately addressed. o Jet noise reduction options are not thoroughly considered. o Crash frequency and impacts are not addressed. o Impact on our Children is not adequately addressed: Childhood learning disability & hearing damage; Impact on students at Coupeville Schools; Impact on children (as well as parents and coaches) playing ball at Rhododendron Park. o Economic impact on tourism, property value loss, decline of population, & loss of businesses is not addressed adequately. o Impact to natural resources is not addressed: bird migration and animal habitat; impact on Ebey's Landing National Historic Reserve, as well as all aspects of outdoor recreation. o Frequency and effects of fuel dumping not addressed.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve

SEQUIM, WA 98382

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance

SEQUIM, WA 98382

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

SEQUIM, WA 98382

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts.

SEQUIM, WA 98382

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.



SEQUIM, WA 98382

1.a. Thank You

4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month)

SEQUIM, WA 98382

1.a. Thank You  
7.c. Noise Disclosure

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

SEQUIM, WA 98382

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

SEQUIM, WA 98382

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment.

SEQUIM, WA 98382

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

SEQUIM, WA 98382

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

SEQUIM, WA 98382

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

SEQUIM, WA 98382

1.a. Thank You

4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.



SEQUIM, WA 98382

1.a. Thank You

4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

SEQUIM, WA 98382

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

Port Townsend, WA 98368

February 19, 2017 If the Navy goes ahead with the extra growler plans, I guess we residents can just kiss our quality of life goodbye. The military can't leave anything alone. You have to justify your existence by spending OUR hard earned tax dollars by ruining our lives, polluting the air, ignoring the effects your activities have on climate change. I find it so depressing that people in my own country are so hell bent on destroying one of the most beautiful places in the world. EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Re: Draft EIS for EA-18G Growler airfield operations at Naval Air Station (NAS) Whidbey Island On behalf of the Sierra Club's North Olympic Group and its 1,000 members, we are commenting on this draft EIS that would expand existing EA-18G Growler operations at the NAS Whidbey Island by adding 35 or 36 aircraft to support expanded electronic warfare exercises on OLFC on Whidbey Island and in the San Juans, Puget Sound, Olympic Peninsula, and adjacent areas. While we support the need for adequate military training, we also support a fair and open public process that protects public health and the environment. Unfortunately, the Navy's draft EIS fails to do so as described below: The Draft EIS Improperly Segments the Navy's Expansion of Growler Activities The Draft Environmental Impact Statement (EIS) is deficient in not addressing 40 additional Growlers that are in the process of delivery beyond the 35 or 36 identified in the Proposed Action. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into multiple separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, a seventh likely process, as confirmed by a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. As a result, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish to protect human health and the environment. Furthermore, this piecemeal approach to public involvement violates NEPA as 40 C.F.R. § 1502.4 "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." In public meetings, the Navy referred to these increases in Growler activities as "adjustments" to its mission, but "adjustments" to functionally and geographically related activities, each of which when taken individually might not rise to the level of "significance," are significant when taken together. This segmentation represents a significant but hidden erosion of environmental protection and public health. Citizens, elected officials, and tribes have reminded the Navy for years that its segmentation of impacts violates both the law and the public trust, but the Navy continues to ignore these concerns. The Draft EIS Fails to Consider All Impacts The draft EIS only analyzes potential impacts for 35 or 36 of potentially 160 Growlers, and is further confined to evaluating impacts only to areas immediately surrounding the runways. However, jet noise, emissions and other impacts from Growler operations adversely affect a wide area including Olympic National Park, state parks, tribal and

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.n. Quality of Life
- 18.a. Climate Change and Greenhouse Gases
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

private lands as well as Puget Sound and endangered Orcas and other species. By failing to enlarge the scope of its analysis beyond Naval Air Station Whidbey Island, the DEIS also violates NEPA by not considering all the interdependent parts of a larger action: Growler operations cannot proceed without takeoffs and landings, regional overflights, broadly distributed noise impacts, etc. By failing to consider these additional impacts, the DEIS also fails to evaluate cumulative effects as required by NEPA. The Draft EIS Fails to Consider All Alternatives The Navy has not made a good faith effort to explore other alternatives as NEPA requires in S40 CFR 1502.14 (a). All of the Navy's 'alternative' scenarios will increase noise, harm to health, and other adverse impacts. The Navy's "no action alternative" would continue Growler operations that currently expose people in homes, schools, parks and businesses to noise that exceeds community standards set by the State of Washington, the EPA, the Occupational and Health Administration (OSHA), and the World Health Organization. No genuine "no-action" alternative is proposed that would address these impacts. Furthermore, the draft EIS violates basic NEPA procedures, as it appears to improperly reflect procurement and operational decisions already made by the Navy. Increased Air Emissions and Worsening Effects on Climate Change Not Adequately Addressed Growler jets use an extraordinary amount of fuel--a single Growler jet's emissions dwarf what thousands of citizens seek to reduce voluntarily by choosing to use electric cars, add solar collectors to their homes, and conserve energy in other ways. In its continuing and planned expansion of the Growler fleet, the Navy has ignored the cumulative impact of Growler emissions, including their effects on climate change. The military is the world's largest single user of fossil fuels, and exhaust emissions beyond the narrowly defined affected areas near runways are not being analyzed and should be. The Navy Has Failed to Document that DOD-Owned Lands Are Unsuitable or Unavailable for Growler Operations The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to examine non-Whidbey Island sites to conduct flight carrier land practice (FCLP). Instead, it continues to assume that an outdated and dangerously small World War II landing strip on Whidbey, the OLFC, can be used for an increasing number of Growler and other training flights. The two most dangerous aspects of flying are the approach, landing and takeoff. Because the OLFC is about 49,000 acres smaller and 3,000 feet short of the Growler standard for these maneuvers, it places nearby schools, hospitals, residences, a state ferry terminal and parks, and a state conference center at serious risk of accidents. This risk is greatly increased because FLCP maneuvers are, by their nature, conducted at low elevations where collision with birds is likely to occur, particularly since much of the surrounding area is a protected habitat for shore birds. The draft EIS, itself, acknowledges that one of the runways at OLFC has an "unacceptably steep angle of bank" and can only be used 30 percent of the time due to weather conditions. Yet knowing this, the Navy is significantly increasing the number of flights there and placing nearby communities at harm. Impact on Threaten Endangered Species Not Adequately Addressed The Navy needs to provide a more detailed and specific response on whether and how the additional Growlers will affect endangered species, particularly Marbled Murrelets, given that the acknowledged lack of scientific information on noise impacts to this species affects the ability to determine harm and cumulative effects. This is particularly urgent in light of their precipitous decline and the December 2016 decision by the State of Washington to reclassify Marbled Murrelets from threatened to endangered. More generally, by failing to initiate consultation under Section 7 of the Endangered Species Act with the US Fish and Wildlife Service on the potential impacts from the

significant increase in Growler flights, the DEIS fails to evaluate direct, indirect and cumulative impacts on threatened and endangered species. Inadequate Consideration of Public Health Impacts Growler jets utilize the latest electronic warfare capabilities yet the risk of exposure to people and wildlife from downward-directed radiation is not considered. The only discussion we are aware of was a brief mention in a 2014 EA, in reference to radio transmitters on mobile emitter trucks and the stationary transmitter at Pacific Beach on the Olympic Peninsula. In that document, the Navy referenced a paper and concluded that links from radiation exposure to leukemia were speculative, when in fact, that same paper stated unequivocally that there are direct links between radiation exposure and childhood leukemia. Despite this, any mention or discussion of risks from exposure to electromagnetic radiation from Navy jets is completely missing from all discussions of potential impacts. The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading for two reasons: (1) the Navy inappropriately uses a 365-day averaging rather than busy-day averaging, and (2) the Navy represents as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. Furthermore, modeled noise levels by the Navy have not been validated with on-site noise data nor has the Navy made any actual noise measurements in the affected communities. In addition, the NOISEMAP software used for computer modeling is outdated, and a report from a DOD commission concluded that noise measurements using this software may be legally indefensible. Additionally, the DEIS selectively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. Moreover, there are no alternatives proposed in this DEIS that would reduce noise. Therefore, it represents decisions already made. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." Also, as mentioned earlier in this letter, by narrowly considering only takeoff and landing noise and exhaust emissions at the runways themselves, the DEIS violates the National Environmental Policy Act (NEPA) §1508.25 by failing to consider the wider area of functionally connected impacts caused by naval flight operations. The DEIS Fails to Consider Historic and Economic Impacts The Navy has not responded to an August 2016 request for formal consultation under Section 106 of the National Historic Preservation Act, from the City of Port Townsend, in a letter also asking the Navy to expand its Area of Potential Effect (APE). The APE is so narrowly defined in this DEIS that the State Historic Preservation Officer (SHPO) wrote to the Navy in January 2017, confirming that not only would cultural and historic resources within the existing APE be adversely affected, but also recommended expanding the APE to include additional portions of Whidbey Island, Camano Island, Port Townsend, and the San Juan Islands, because the state is "...not convinced that the 65 dBA serves as the best or most appropriate measure for quantifying and assessing harmful levels of sound and vibrations from Growler activities." The SHPO went on to say, "Our concern is based upon what appears to be an averaging of sound levels over long time periods that does not adequately capture the real time experience of brief but more numerous exposures to higher decibel levels, as well as the cumulative effect of these events." Additionally, the addition of Growlers will have a deleterious effect on the economy of the region. The region is heavily dependent on recreation and tourism and Washington's overall economy is heavily dependent on tourism and outdoor recreation, accounting for: \$22.5 billion annually, 227,000 direct jobs, and \$1.6 billion in tax revenues. Accordingly, any expansion of the Growler fleet

needs to address potential job loss, economic harm, and state revenue loss from decreased tourism and outdoor recreation. Conclusion For all of the deficiencies, omissions, and failures to properly implement NEPA, as cited above, we are asking the Navy to issue a revised, second draft EIS with a new public comment period. We appreciate the opportunity to comment on this draft EIS. Sincerely, [REDACTED]  
North Olympic Group, Sierra Club PO Box 714 Carlsborg, WA 98324



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation LOCAL, LIVE & WORK IN COUPEVILLE

3. Address [REDACTED] COUPEVILLE, WA. 98239

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

AS A CITIZEN OF COUPEVILLE AND A REAL ESTATE BROKER AT WINDERMERE I AM VERY AWARE OF THE ECONOMIC BENEFITS OF THE NAVY AIR FORCE BASE IN OUR ~~AREA~~ COMMUNITY. NEARLY HALF OF THE CLIENTS I SERVE ARE NAVY OR RETIRED NAVY. THE OTHER HALF ARE RETIRED OR CHOSE TO LIVE HERE TO RAISE THEIR FAMILIES. MOST RESIDENTS SHARE ONE THING IN COMMON AND THAT IS AN APPRECIATION OF THE UNIQUE BEAUTY AND QUIET OF OUR ISLAND. IN MY MIND, THE NEW PLAN BY THE NAVY, PARTICULARLY OPTION 1, IS AN UNACCEPTABLE OPTION DUE TO THE INCREASE

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 2.m. Record of Decision/Preferred Alternative



All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

IN NOISE THAT IT WOULD CREATE FOR OUR COMMUNITY.  
AN INCREASE SUCH THAT IS PROPOSED WOULD CAUSE SERIOUS  
ISSUES WITH PROPERTY VALUES THAT IN TURN AFFECTS  
THE ECONOMIC WELL BEING OF OUR CITIZENS  
AS A REAL ESTATE AGENT I KNOW THAT MOST PEOPLE USE  
AN INCREASE OVER TIME IN THEIR PROPERTY VALUES TO  
DO MANY IMPORTANT THINGS THESE INCLUDE FUNDING  
THEIR CHILDRENS COLLEGE OR UNIVERSITY STUDIES, PAYING  
FOR A WEDDING, HELPING THEIR KIDS BUY THEIR OWN HOME,  
OR ~~PLAN~~ TO FIND A LIFE CHANGE INTO RETIREMENT.  
THE INCREASE YOU ARE PROPOSING WOULD ESSENTIALLY  
CREATE A LOCAL "CRASH" OF THE REAL ESTATE MARKET  
THEREBY AFFECTING THE VERY INDIVIDUALS YOU ARE  
TRYING TO PROTECT.  
THE ONLY SOLUTION IS TO DO A 50/50 SPLIT  
BETWEEN THESE COMMUNITIES TO SHARE THE BURDEN  
EQUALLY.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic

6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**



Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:  
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

1. First Name \_\_\_\_\_

2. Last Name \_\_\_\_\_

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Shaw Island, WA 98286

5. E-mail \_\_\_\_\_

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**

3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**

4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

**Action: Noise levels should only be averaged over active flying days.**

5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**

6. The Draft includes some independent noise measurements and ignores others.

**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

*The noise is disruptive.*

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Coupeville, WA 98239

1.a. Thank You  
4.t. Noise Mitigation

As a long-time resident of Coupeville I support the Navy's actions and plans regarding the Growlers and utilization of local airfields including OLF. All I would ask is that you be a good community citizen (which I believe the Navy is and strives to be) and perhaps not practice/train on festival weekends. Other than that I give 100% support to the proposal. Go for it!