

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 A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.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

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.

Coupeville, WA 98239

The introduction of the Growler to Central Whidbey has brought significantly higher noise issues that are damaging to one's hearing and health. We have been caught riding our bikes during touch and gos and found that we had to get off our bikes and put our hands over our ears. Even that was not enough. When the Prowlers were flying we did not have to do this. In addition there are the risks to the drinking water from fire retardants and with an increase in flights the chance of crashes and fires becomes much greater requiring more fire retardant to be used. Central Whidbey relies on a sole source aquifer for our drinking water and it would be devastating to human health if our wells were contaminated. The Growler and the expansion plans cannot coexist safely with people living close in the vicinity.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

1.a. Thank You

12.n. Quality of Life

7.d. Recreation and Wilderness Analysis and Study Area

As an avid outdoorsman on Whidbey Island, I felt the need to share my perspective. I ride my bicycle all over the Island, roughly 5000 miles a year. I have ridden all over America and much of Europe. I have ridden on crowded and loud (horns and traffic) roads, anxious to leave the 'bustle' for quiet roads and awesome nature, like we have on Whidbey. Now with the Growler activity, I DREAD riding my bike near OLF during touchdown drills. In fact, I need to STOP my bike and cover my ears!!! It is the WORST feeling when your home is now as bad as any of the unpleasant times I've experienced on my bike in my 30 years of riding. I also have taken to crabbing and fishing. I must wear headphones to 'tolerate' the booming noise when the F-22s fly overhead instead of enjoying the serenity of the gentle surf splashing on the shoreline.

Coupeville, WA 98239

1. the DEIS did not comply with NEPA, as off-Whidbey Island sites were not judiciously examined. 2. The averaging of sound does not reflect the noise experienced by residents when planes are overhead. 3. There is a risk of plane crashes 4. outdoor workers are most affected, as as these workers are for the most part low-income or of ethnic minorities, this is an example of Environmental Injustice. 5. the impact on children and their development is not adequately addressed. 6. Economic impacts. People will move away and property values will fall, resulting in a diminished tax base. The APZ will affect property values. 7. Economic: tourism will suffer. Who wants to visit a town, or walk on a bluff trail, or kayak, when there is incredible noise overhead? 8. water pollution. PFOA and PFOS has been found in wells near OLF, and is likely from the flame retardant. The Navy has not guaranteed that this material will not be used again.

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
12.d. Population Impacts
12.h. Tourism
12.j. Property Values
13.a. Environmental Justice Impacts
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
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

1.a. Thank You



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

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

This intrusion upon sacred space for our forests, oceans, and rivers is truly unacceptable. The endless expensive preparation for war sucks the life out of our social systems, feeding the military industrial machine. Stop this travesty.

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

Oak Harbor, WA 98277

Keep OLF operating! This practice field is critical to the pilots safety when operating on Aircraft Carriers & an ESSENTIAL PART of our Nation's Defense & Security! I grew up on Whidbey in the flight line of the A6, EA6B, & now the Growler EA18G! My family still lives in the house. Never have there been any medical issues related to hearing "The Sound Freedom!" I couldn't imagine never looking up & not seeing the jets fly over our beautiful island! Keep OLF OPERATING, as well as NAS WHIDBEY!

1.a. Thank You

Oak Harbor, WA 98277

Keep OLF operating! This practice field is critical to the pilots safety when operating on Aircraft Carriers & an ESSENTIAL PART of our Nation's Defense & Security! I grew up on Whidbey in the flight line of the A6, EA6B, & now the Growler EA18G! My family still lives in the house. Never have there been any medical issues related to hearing "The Sound Freedom!" I couldn't imagine never looking up & not seeing the jets fly over our beautiful island! Keep OLF OPERATING, as well as NAS WHIDBEY!

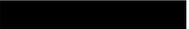
1.a. Thank You

Port Angeles, WA 98362-8429

The Navy's take-over of the Olympic Peninsula and anything else it wants... is unnecessary and we object! That's all I will say since you don't listen to us anyway.

Port Townsend, WA 98368

I have two questions regarding this EIS: 1. At what point was an EA or EIS done for the proposed project that authorized the funding and deployment of Growler operations now under consideration? The current EIS "no action" does not seem to be a true "no action" alternative, but more of a "what magnitude of action shall we engage in" set of alternatives. Please explain. 2. While I can support the mission of electronic interference warfare and training for national security purposes, I do not understand why this particular technology cannot be achieved with less impact on natural quiet. Why does electronic warfare technology need such LOUD machines? Have military industrial engineers done research towards developing technology that can achieve the same objectives without noise that is enormously disruptive to local communities? Thank you for responding to my actual questions rather than with a canned letter response.



- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 4.t. Noise Mitigation

Port Townsend, WA 98368

1.a. Thank You

4.e. Day-Night Average Sound Level Contours and Noise

The Draft EIS does not address impacts to outlying communities for the proposed increase in airfield operations. We hear Growler activity over Port Townsend, so I would assume that the dramatic increase in activity being proposed would affect this community as well as other communities in the region. Please see that the long term and cumulative effects of Growler aircraft noise and vibrations are considered and evaluated for outlying communities and natural areas in the Final EIS.

1.a. Thank You

burien, WA 98166

Terrible disruption of the quiet of Olympic Peninsula and coast areas!

Coupeville, WA 98239

The environmental impacts of the following issues due to increased flight operations at OLF are not adequately addressed in the Draft EIS: health effects from noise and low-frequency sound, business, schools, hospital, county and town public government operations in the Coupeville area, decreases in tourism in Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Ft Casey State Park, Pacific Rim Institute; decreases in private property values due to noise and known poisoning of private and public wells, outdoor recreation and child/family health at Rhododendron Park ball fields, aquifer and well contamination affecting residents and agriculture, effects of addition of APZ's around OLF on property use and value, effects on marine and terrestrial wildlife, security risk for Whidbey Island by siting all Growlers here. The noise is deafening, and an increase of a factor of 6 of authorized flights per year up to 135 per day would make it unliveable. The farms and local wildlife are dependant on clean water, our tourism and local economy will be negatively effected as well as locals and workers well being.

- 1.a. Thank You
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 4.o. Classroom Learning Interference
- 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.d. Recreation and Wilderness Analysis and Study Area

Seattle, WA 98112

I am highly opposed to the use of the Olympic National Forest for Navy "war games" and trainings. The national forests are a jewel of our nation, and they are for all to enjoy. We must protect them and the wildlife and natural environments they embody for generations to come. Conducting thousands of war games per year with high decibel growler planes would not only be a grave threat to the natural environment, but would ruin the enjoying of the park for many people every year, particularly given their unscheduled nature. Please find somewhere else to conduct these games, as the national parks are for everyone, and are not a military playground to be taken away from the citizens at will.

1.a. Thank You

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

19.d. Electronic Warfare

2.n. Alternatives Considered But Eliminated

7.d. Recreation and Wilderness Analysis and Study Area

Seattle, WA 98116

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). I urge the Navy to move the Growler operations to a more appropriate location, well away from populated areas and sensitive wildlife areas.

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

Seattle, WA 98116

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. The Growler noise levels are a serious hazard to people in the area, including children. I urge the Navy to do a more accurate study of noise levels.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

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

Seattle, WA 98116

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.

Seattle, WA 98116

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.

Seattle, WA 98116

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.

Seattle, WA 98116

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.

Seattle, WA 98116

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.

1.a. Thank You

4.q. Potential Hearing Loss

Seattle, WA 98116

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.

Seattle, WA 98116

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.

Port Townsend, WA 98368

Please extend the comment period for the EIS regarding EA-18A Growler expansion program on Whidbey Island by 60 days. Too many residents are absent or distracted this time of year for the public response to be meaningful or adequate. Additionally, the Navy had promised this EIS comment period was to begin in February, leading the public to believe and rely on a later comment date. Please extend the comment period by 60 days.

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

Port Townsend, WA 98368

I'm opposed to the expansion and continued use of Growler Jets on Whidbey Island and the surrounding Olympic Peninsula. The noise created by the Growler flights, according to scientific data, can cause a host of human health issues, including increased blood pressure, anxiety, and permanent hearing loss. In addition, this area is an environmentally sensitive area with wildlife both in the sea and on land. The Navy's EIS does not address these concerns adequately and therefore the EIS must be rejected. The area the Navy has included in the EIS is much smaller than the true impact area. I live in the North Beach area of Port Townsend and the noise pollution from the Growlers is such that I'm unable to be outside during training. The noise is painful to my ears, significantly raises my blood pressure, and causes a high level of anxiety. Even indoors, the noise level negatively impacts me. And yet, Port Townsend isn't included in the EIS's impact area. Like all United States citizens, the Navy is required to submit a comprehensive and complete EIS so a true analysis of safety can be performed. This has not been done previously or currently. I understand the importance of training missions for the Growler Jets but this cannot override the health and safety of our citizens and wildlife. The laws are in place to protect US citizens and resources, that's what makes this country great. If the laws are not respected, our citizens aren't being protected, thus weakening our country from the inside. The Navy must follow the same laws as everyone else to help protect US citizens and keep us safe on a daily basis. Otherwise, the threat to our citizens will be coming from those sworn to protect us! Make the EIS a fair and thorough process, and expand the area of impact and utilize real time noise data in the EIS. Thank you, [REDACTED], Port Townsend WA

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Lopez Island, WA 98261

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

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

Lopez Island, WA 98261

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- 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.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 7.h. San Juan Islands National Monument

Lopez Island, WA 98261

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- 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.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Coupeville/Admiral's Cove, WA 98112

As a military veteran, let me begin by expressing my gratitude to the men and women who serve our country every day - including the Navy personnel who protect our region and help the local economy. As a resident of Admiral's Cove, I ask that you reduce the amount of noise pollution associated with the new Growler Jets. Please consider closing the OLF or eliminating night flights at the OLF. If these new growler jets are allowed to continue, also consider maintaining the current practice of not flying on weekends. Many of us rely on weekend visitors for our livelihoods and flying on weekends will hurt our income. The noise from these new jets makes it impossible to be outdoors, to sleep, and even to work indoors. The mental and physical impacts of these flights are real. The last time the jets flew, I felt shaky, weak, and slightly nauseous. People just should not be living within proximity of these flight exercises. Perhaps a conversation should be pursued about the feasibility of acquiring the adjacent residential properties in the flight path if the OLF is essential to maintaining the training standards required for the Navy to fulfill its mission. Thank you for serving our country and for considering feedback pertaining to the health of the citizens living close to the OLF.

- 1.a. Thank You
- 12.k. Compensation to Citizens for Private Property
- 2.n. Alternatives Considered But Eliminated
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation

Hoquiam , WA 98550

- 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).

Hoquiam , WA 98550

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.

Hoquiam , WA 98550

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

Hoquiam , WA 98560

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.

1.a. Thank You

17.a. Hazardous Materials and Waste Impacts

Langley, WA 98260

First, thank you for hearing and accepting comments from the community. Second, Thank You for the work you do in service for our country. I am writing to encourage the NAS-Whidbey to consider the effects on the environment the Growler Airfield has. Whidbey Island is now and has been historically an agricultural food producing economy. Farmers, producers, fisherman and stewards of the land have done tremendous work to preserve this land to sustain feeding our community. I understand the need for the Growler Airfield however, I'd love to find a better home or resolution, less harmful to the natural environment so we can keep our land producing food and jobs for community members for decades to come. Thank you.

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 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

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 17.a. Hazardous Materials and Waste Impacts
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
 - 2.i. Proposed Action
 - 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
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.h. San Juan Islands National Monument

comments and offer further opportunity for public comment before the Final EIS is prepared. 12. Why are the additional 40 EA18-Gs contracted for NASWI not addressed in the Draft EIS? ACTION: include the activities and noise and toxicity impacts of the additional 40 aircraft on the environment in a new Draft EIS. Provide additional time for public comment before the EIS is finalized. 13. Noise and toxicity impacts on land and sea life have not been adequately considered.

Hoquiam, WA 98550

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) 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

- 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

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] Hoquiam, WA

1.a. Thank You

Seattle, WA 98115

I object to this.

1.a. Thank You

7.d. Recreation and Wilderness Analysis and Study Area

Port Angeles, WA 98363

I am a lone voice in the wilderness, literally and I share the Olympic National Park and other nearby areas with my grandsons and thousands of visitors to our area. I say "our" because I believe the Park belongs to all of us. I hike weekly with a group who enjoy it's unique ecosystem... it's beauty, variety, and solitude provide a necessary respite from the noisy clamor of our everyday surroundings. I believe some things cannot be undone and that allowing the addition of more Growlers to the area will negatively effect the solitude, obviously, but additionally could effect the wildlife in the Park as well. We should not proceed without further studies of these potential negative effects. Thank you for your consideration.

COUPEVILLE, WA 98239

From an ex Spad driver from VA 145 from 1965 to 1972. We moved here knowing we had some, I say some, flights to and from OLF. This new plan is unacceptable to me as an ex Navy pilot. You are totally out of line basically destroying property values for all of the Coupeville area . I assume your flight plan is to ingress from Admiralty Inlet and exit the same way. As one in the flight path for the pattern landing South to North I tell you well over half of the flights grossly overshoot the pattern and come in at low level, Im guessing 600 feet and well over the land, and we are at least 4 miles south of OLF. I have seen a rough statement from some Navy voice that said Oak Harbor gets enough noise, so lets take some of it to Central Whidbey. You are setting up a battle between the South end and North end of Whidbey which will impact all the stores in Oak Harbor as the South shops south. You want Oak Harbor to be a Navy town you will do so, but the rest of Whidbey will hate your guts. I flew at Lemoore and Alameda. All of our carrier practice was well away from both cities. Crows Landing was used, and from Alameda we went to Fallon....all fields well away from civilization. Im 100% pro Navy, but this huge influx of planes at OLF and low level flying is not a good plan.

1.a. Thank You

12.j. Property Values

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

3.i. Runway Operating Hours and Flight Schedules

Sequim, WA 98382

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

We are being bombarded by decisions and deadlines during the busiest, most distracted time of the year! This is deliberate and insulting to the citizenry! I request a 45-day timeline extension.

Coupeville, WA 98239

I would like to request that the expansion of the EA-18G Growler planes on Whidbey Island be cancelled and a more appropriate site that is not in a densely populated area be found. The noise from these aircraft can have a significant effect on the learning ability of school children with frequent interruptions in classroom presentations that can affect concentration and impair learning. The noise from these aircraft is actually painful for those exposed outdoors. Your study does not take into consideration the impact of this discomfort on the levels of stress on those subjected to this noise can create. Those subjected to night flights will also have interrupted sleep and children and the elderly will be the most severely impacted. It seems to me, that having Boeing correct this increased sound problem would be a benefit to all concerned and make these planes more readily accepted by the population on Whidbey Island. If relocation of existing planes or another location for the additional planes slated for Whidbey as a whole cannot be accomplished, I request that the scenario c and alternative 1 in your literature be implemented. The NAS base is widely accepted by the City of Oak Harbor with "I love jet noise" signs abounding. Coupeville on the other hand does not share the same love of jet noise and Coupeville residents suffer greatly from the current level of flights at the Outlying Field for the following reasons: Coupeville is predominately a tourist town and tourism is our main source of income. More frequent flights would severely impact the livelihood of many Coupeville businesses and increase the poverty rate of our citizens. Coupeville is also the home of the very first National Reserve and the City of Coupeville and much of the surrounding area are within the park boundaries. This national treasure needs to be preserved. Coupeville is also demographically heavy in senior citizens who are most sensitive to the noise of the Growlers. Studies show that proper sleep without interruption is essential for senior's mental health and cognitive functioning. Cognitive decline is going to be a huge cost to our country as the Baby Boomers age and adding to the likelihood of Coupeville's senior population experience a more rapid decline could tax our already depleted resources in caring for the elderly. The Navy is focusing on protecting our citizens from attack and that is an admirable goal but if, while preparing for a possible attack, the Navy is impairing the mental, physical, and emotional well-being of it's citizens, it is not protecting us but harming those you have sworn to protect.

- 1.a. Thank You
- 12.h. Tourism
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.g. Ebey's Landing National Historical Reserve

Coupeville, WA 98239

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives

Thank you for the opportunity to comment. The National Environmental Policy Act (Section 1502.1) says, in part that an Environmental Impact Statement ..."shall provide full and fair discussion of significant environmental impacts and shall inform decision makers AND THE PUBLIC OF THE REASONABLE ALTERNATIVES which would avoid or minimize adverse impacts or ENHANCE THE QUALITY OF THE HUMAN ENVIRONMENT". This draft fails to address virtually any alternatives that would either minimize impacts or enhance the human environment. Please address this problem honestly and in the spirit of NEPA in the next draft. Respectfully, [REDACTED] citizen, Ebey's Landing National Historical Reserve Coupeville, Washington

Coupeville, WA 98239

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.m. Record of Decision/Preferred Alternative

Thank you for the opportunity to comment. According to Section 2.1 of the EIS...Beginning as early as 2017, the Navy proposes to: • continue and expand existing Growler operations at the Naval Air Station (NAS) Whidbey Island complex, which includes field carrier landing practice (FCLP) by Growler aircraft that occurs at Ault Field and Outlying Landing Field (OLF) Coupeville • increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare environment • construct and renovate facilities at Ault Field to accommodate additional Growler aircraft • station additional personnel and their family members at the NAS Whidbey Island complex and in the surrounding community NEPA 1502.2 (f) clearly states "Agencies shall not commit resources prejudicing selection of alternatives before making a final decision" (g) goes on to say "Environmental Impact Statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made." Unless the Navy is exempt from the specifics of NEPA, the idea of initiating any action as described above, prior to the release and review of a final EIS for this proposal, seems to be outside the law. If the Navy is exempt from these laws, that should be clearly stated within the EIS and made plain to decision makers and the public in an open and clear manner. In the event that the Navy is not exempt from these laws this seems like a statement that could be challenged in legal proceedings. Please clarify. [REDACTED] citizen, Ebey's Reserve Coupeville, Washington

Coupeville, Ebey's Landing National Reserve, WA 98239

1.a. Thank You
4.o. Classroom Learning Interference

Thank you for the opportunity to comment. In section 4.2.5 there seems to be no mention of either Coupeville Middle School or Coupeville High School in the EIS charts the refer to classroom learning interference from the EA-18 growler training from OLF Coupeville. I have personally seen these aircraft over the school complex in Coupeville and failure to include these facilities in the EIS needs to be corrected. [REDACTED] Coupeville/Ebey's Landing December 6th, 2016

Coupeville, WA 98239

Thank your for the opportunity to comment on this DEIS for growler expansion at NAS Whidbey Island This DEIS speaks virtually nothing as to the impact on Ebey's Landing National Historical Reserve with respect to Section 106 of the National Historic Preservation Act. The 106 Process for this has been virtually left out. There have been no consultations with 'consulting parties' whatsoever. A new Draft EIS should be written to include the impacts of noise, vibration, historical and cultural changes and complete impacts to Ebey's Landing National Historical Reserve, the nation's first National Historical Reserve. Respectfully, [REDACTED]

1.a. Thank You
8.b. Section 106 Process
8.c. Noise and Vibration Impacts to Cultural Resources
8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

Coupeville, WA 98239

First of all, thank you for extending the comment period for this draft EIS. It will more fairly give organizations and government entities , along with private citizens to research the contents of the document(s) and make more informed comments. That said, this draft EIS is much too long and burdensome for true public investigation of the impacts involved in the expansion of Growler flights in North and Central Whidbey Island. The National Environmental Policy Act (NEPA) states clearly (Section 1502.7)that an EIS, even for proposals of unusual scope, should not normally exceed 300 pages. At a length in excess of 1500 pages, this draft creates a document that takes far too much time and knowledge for the lay person to understand . Therefore, the draft EIS should be re-done to conform to NEPA regulation and allow for the general public to read, understand, and comment on the impacts in a timely fashion. Thank you for the opportunity to comment.

██████████ Coupeville, Washington January 23rd, 2017

1.a. Thank You

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

2.c. Compliance with the National Environmental Policy Act

Coupeville, WA 98239

Thank you for this opportunity to comment on the dEIS for Growler expansion at NAS Whidbey Island. The National Environmental Policy Act (NEPA) (Section 1502.2 paragraphs f and g clearly state; 'Agencies SHALL NOT commit resources prejudicing selection of alternatives before making a final decision'... and 'Environmental impact statements shall serve as THE MEANS of assessing the environmental impact of proposed agency actions, rather than JUSTIFYING DECISIONS ALREADY MADE' In June of 2013 DoD appropriations added Growler aircraft and funding for them. Authorization to purchase more Growlers was approved in 2015. At open meetings held by the Navy in December of 2016 it was clearly stated by several members and representatives of the Navy that this expansion was going to happen. Time and time again, I heard the phrase, "They are coming, They are coming and you better accept it." It seems clearly that a decision has already been made. These actions and statements clearly conflict with both the letter and the spirit of the National Environmental Policy Act as described above, and would clearly seem to be a violation under the law. The commitment of resources for this action was clearly a violation of law, and in as much, the purchase of Growlers, the training of pilots, and conducting Field Carrier Landing Practices (FCLPs) at NAS Whidbey and at the OLF Coupeville should be halted until such time as a complete and honest Environmental Impact Statement is drafted, opened to public comment and been made subject to legal judgement and approval. [REDACTED]
Coupeville, Washington January 23, 2017

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act

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

Coupeville, WA 98239

Thank you for the opportunity to comment on the Draft EIS for expansion of Growler flights at NAS Whidbey. The National Environmental Policy Act (NEPA) section 1502.1 Purpose... ..States that an EIS ... "shall provide a full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." ... The Navy's draft EIS for expansion of Growler operations at NAS Whidbey Island clearly has neglected to offer serious reasonable alternatives which would avoid or minimize adverse impacts, particularly noise impacts. They have offered no alternatives whatsoever that might actually enhance the quality of the human environment. This is a clear failure of the draft EIS as to the intent and purpose of the Act, and should, in itself, disqualify this document as a serious effort to fulfill the letter and spirit of the National Environmental Policy Act. The draft should be re-written to include the many reasonable alternatives to flying all fclps at Ault Field or the OLF Coupeville. The Navy and other Military branches have any number of highly adequate alternatives to draw from within a reasonable distance from Whidbey Island. [REDACTED] Coupeville, Washington January 23, 2017

Coupeville, WA 98239

Thank You for the opportunity to comment. Relevant to dEIS - 5.4.3.2 Relevant Past, Present, and Future Actions which says...The past, present, or reasonably foreseeable actions that have a potential to interact with the Proposed Action and cumulatively impact public health and safety are those that have the potential to affect flight safety, Bird/Aircraft Strike Hazard (BASH), and Accident Potential Zones (APZs) and Clear Zones within the NAS Whidbey Island complex. Therefore, the VQ disestablishment project is included in this analysis. Question/Comment How can increasing the number of operations from the complex with the addition of P8s and other aircraft stationed on base not be included in this assessment? The idea that more aircraft, more pilots in need of training and more pilot/crew that need to maintain readiness means that aircraft will be in the air much more of the time throughout the complex. To say that this does not increase the chances of some form of accident or crash is not realistic.

1.a. Thank You

1.c. Segmentation and Connected Actions

5.a. Accident Potential Zones

5.d. Environmental Health Risks and Safety Risks to Children

[REDACTED]
Coupeville, Washington 98239

Email: coupevillan@mac.com

January 23, 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

Thank you for the opportunity to comment on this horrific expansion of Growler activity at NAS Whidbey and associated horrific increase in FCLP at OLF Coupeville

My first comment:

I respectfully request that due to the expansive nature of this proposed action and the controversies that have developed in the communities directly effected by this proposed expansion that the Navy create a 45 day comment period following publication of the final EIS so as to allow for interested parties to review the final draft and make their thoughts and concerns know to the Navy, their elected representatives, and members of the press.

RE: Health Effects

The document states in part ...“ 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]

The Washington State Board of Health has determined that jet noise at NAS Whidbey is a public health hazard for anyone living within the flight paths of the EA-18 Growler. There is much more current science that has evidently been ignored to create this DEIS. The Navy should contract an independent agency to fully study the health effects of Growler noise on humans, birds and quadrupeds living in the areas to be affected by this expansion.

RE: 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

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.o. Cost-Benefit Analysis
- 2.a. Purpose and Need
- 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
- 3.a. Aircraft Operations
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 8.b. Section 106 Process
- 8.f. Cultural Landscape and Impacts to Ebey’s Landing National Historical Reserve

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?

The final EIS should reflect the additional impact of increasing fFCLPs at OLF Coupeville.

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

RE: Population actually affected

The DEIS vastly underestimates/understates the number of people, including children, who might be impacted by noise or other risk under this expansion. Hundreds of thousands, if not millions of people travel to this special part of the country annually. They come to recreate in our parks and historical communities, and in the case of Camp Casey, participate in festivals such as the Whidbey Kite Festival and to attend sport instruction camps.

RE: Single Siting of all Electronic Warfare Aircraft

Aside from the fact that Single siting of any military function violates the Technical Joint Cross Service Group guidelines. Single siting of all EA-18 Growler aircraft on Whidbey Island violates common sense as well. Siting on an island with limited ground access limits access to fuel sources, water sources, power sources, food sources, medical care and other services in the event of a natural disaster such as an earthquake or tidal wave.

RE: Accident Potential Zones

Failure to include Accident Potential Zones in the DEIS fails to allow for any real understanding of what those designations might mean for property owners who might be adversely affected by the creation of these zones. Inclusion of APZs must be part of any final draft EIS along with the full mitigation measures to compensate for the taking of these properties.

RE: Financial/Economic Environment

The DEIS fails to fully study both the full extent of the economic costs vs. benefits of this action to communities affected by the proposed expansion. A full economic study of the real costs of this passion should be included in any final document.

RE: Ebey's Landing National Historical Reserve / Area History

The lack of inclusion for the impact to America's first National Historic Reserve, Ebey's Landing, shows a lack of understanding and respect for the Reserve, its place in the history of this country, the hundreds of thousands of people who visit it every year. It also shows a disregard of the Navy's understanding or concern for the National Historic Preservation Act and the process, under section 106 of the Act. The Navy must involve itself in consultations with the other federal agencies involved in reviewing this proposed action.

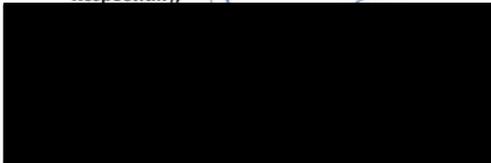
In conclusion:

Again, thank you for the opportunity to comment on this proposed action that will likely change peaceful and historical aspects of this area as we know it. Historical areas last only as long as they are protected from encroachment by factors that destroy them. Once gone, they are gone. They cannot be brought back.

The Navy has a mission, but it also should have a mindful understanding of the consequences of that mission on the people and areas it inhabits. Navy personnel are widely aware of the nature of the places that they want to raise their families and retire. Whidbey Island has provided a unique area for Naval personnel to do just that. Those who have been stationed here for any amount of time know that the Growler is the loudest aircraft ever to ply these skies. They don't want to live beneath their flight paths any more than those of us who purchased property and homes here before the arrival of this shock and awe aircraft.

There are real, viable alternatives for single siting all these aircraft. There are real viable alternatives to flying FCLPs at OLF Coupeville, at least in the numbers proffered in the DEIS.

Respectfully,



Jefferson County, WA 98368

Dear EIS Project Manager: In response to the Naval Air Station Whidbey Island's request for comments regarding the Environmental Impact Statement (EIS) on Growler Operations, the Jefferson County Board of County Commissioners submits the following for your consideration. In our weekly public meetings, as well as via email, phone calls and conversations with constituents, there are many East and West Jefferson County residents expressing concern about the impacts to their well-being as a result of Growler noise. These impacts include (but are not limited to): -loss of sleep; -inability to hold a conversation uninterrupted; -complaints from customers at hospitality businesses; -concern for well-being of domestic and farm animals as well as marine mammals; - loss of quality of life benefits from time spent recreating outdoors; - fear of declining property values from increased Growler activity. These residents have also expressed their dissatisfaction in the EIS to adequately address the severity of those impacts at current levels of operation. For example, the lack of data collected locally versus projections generated from noise modelling leads many of us to ask whether these projections are accurate, whether they account for the variability in how noise and reverberations affect a diverse population, and whether the Navy is a concerned enough neighbor to invest in collecting data locally. Similarly, the use of daily averages does not capture the full effect of noise that occurs in short, intense periods. This way of measuring sound is not relevant to analyzing impacts to our residents. There is also concern that flight paths and elevations are not accurately represented in the EIS or in the Navy's responses to complaints. A Navy veteran reports seeing jets flying as low as 1000' over Marrowstone Island. Cape George residents report increased noise from the Growler's "afterburner" technology. Neither of these impacts are acknowledged in the noise contour maps in the EIS, again causing concerns that impacts are not being measured or accurately reflected. We are also hearing significant concern in the public process. Residents are confused by needing to submit separate comments for Growlers than for Electromagnetic Warfare, and that comments on the latter may only submitted by those who submitted them previously. Similarly, cumulative impacts of land and water-based operations should be considered to assess the full impact to our County. Having a clear process, with a long timeline (particularly around the holidays) seems essential to build trust in the transparency of any public agency. While we recognize the Navy as an important and beneficial neighbor and partner to Jefferson County in myriad ways (Emergency Preparedness efforts, the Hood Canal Joint Land Use Study and REPI funds for land conservation, for example), we are concerned that the EIS is not accurately reflecting the impacts to the quality of life of some Jefferson County residents. An increase in growler activity will create further negative impacts here, and as such we request that more localized study be completed and data be assessed before any decisions on expansion are made. We appreciate the opportunity to work with you in maintaining this as one of the most beautiful, serene and safe corners of the world. We encourage continued, transparent dialogue with the many neighboring jurisdictions and residents to find solutions that meet the needs of our rural region. Sincerely, [REDACTED]

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 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
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.f. Noise Measurements/Modeling/On-Site Validation

**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

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.

- 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

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:

Doesn't 2017 technology have a solution to diminish the noise factor of these planes?

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 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

Coupeville, WA 98239

The impact of the number of flights at OLF is already a burden on the school and community. While tolerating some level of this is acceptable, increasing the number of flights by six times is simply unacceptable for the community. It will turn coupeville into an area similar to the areas surrounding the Sea Tac airport where property values are depressed and destroying all of the Whidbey Island charm. Coupeville was one of the first areas settled in the state, let's not destroy it by using it as a testing ground for massive military operations.

- 1.a. Thank You
- 12.j. Property Values
- 4.o. Classroom Learning Interference
- 7.a. Regional Land Use and Community Character

1.a. Thank You

Port Townsend, WA 98368

NO MORE GROWLERS! 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,

[Redacted signature]

Name: [Redacted]

Address: [Redacted] Wa 98362

cc: Hon. Derek Kilmer, U.S. Congressman, 6th 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

Coupeville, WA 98239

My wife and I live directly on the touch and go flight path a mile south of OLF, Coupeville, WA. The practicing the flights are everybthirty seconds. The noise is unbearable even indoors. There are over 400 homes in Admirables Cove alone. Sound is damaging. Risk of crash is inexcusable in populated areas. Pollution of ground water is now documented, and you are propping to increase the damage. Please stop hurting us!

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.a. General Noise Modeling
- 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

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

Langley, WA 98260

The deleterious impact of Growlers on property values, tourism and quality of life, not to mention the human health and safety of residents/visitors due to noise cannot be overstated. These jets must be tested in non-populated areas.

Coupeville, WA 98239

My house is a short distance from the end of the runway. I was never informed that the noise from the jets was capable of causing permanent damage to my hearing, as well as a multitude of other dangers to my body, heart, and health. These flights even run late at night. Why subject us all to this when there are other viable locations where the Navy can run this training? This is outrageous.

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

Portland, OR 97217

To Whom It May Concer, Thank you for extending the comment period 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. Here are my objections to the proposal at hand: 1. Jet noise is a huge factor: 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. This is not acceptable. 2. Consider the cultural impact: Impacts to cultural and historic sites have not been 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) 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). This too is unacceptable. 3. Consider the tactics: 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

- 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.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

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. This too is unacceptable--the public has a right to know.

4. Consider groundwater and soil: 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. Freshwater is our most precious resource; we cannot afford to contaminate it.

5. Consider the EM radiation: 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." The public should not be subjected to effects associated with EM radiation.

6. Consider the comment period: 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. Whidbey Island is not the Nevada desert; it is home to both wildlife and people who depend on a nature-tourism

economy. A longer comment period is absolutely necessary here. 7. Consider the noise: 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. Consider the alternatives--or lack of them: 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. Consider this omission: 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. Consider the lack of data: 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. Consider the unrealistic standards: 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. Consider the differences: 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. Consider the omissions: 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. Consider the software: 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. Consider what has since been disclosed: 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. Consider the altitudes: 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]

Clinton, WA 98236

██████████ Clinton, WA 98236 December 17, 2016 EA-18G EIS
 Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic Attn: Code
 EV21/SS, 6506 To whom it may concern; I am a resident of Whidbey Island, and have
 spent a significant amount of time in the Coupeville area. Thus, I've experienced firsthand
 the deafening roar of jets coming into the OLF for practice landings. In addition, I have a
 residence on Cypress Island, and have also experienced firsthand how loud the jets are
 when they are flying in an area where they don't even have good reasons to be flying
 close to the ground. Below are my comments on the EIS for increased Growler traffic on
 north Whidbey and increased flights over the San Juan islands and the Olympic National
 Park: 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 Rhodedendron 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. Sincerely, ██████████

- 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
- 11.a. Groundwater
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.a. Purpose and Need
- 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.d. Recreation and Wilderness Analysis and Study Area
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National
 Historical Reserve

Coupeville, WA 98239

1.a. Thank You

5.a. Accident Potential Zones

Why doesn't the DEIS include realistic Accident Potential Zones (APZ) for the proposed 9 scenarios? The only APZs I've seen barely cover the actual ground track of the flight patterns. An out-of-control aircraft is not necessarily going to stay within that track. In fact, more realistic APZs are needed for the current level of operations.

Coupeville, WA 98239

The Draft EIS doesn't adequately address the increase in Sound Power Levels (SPL) from aircraft flying at various altitudes. Aircraft fly so low over my house, I can see the pilots' faces when they're in a banking turn. I would estimate their altitude to be no more than 500 feet. Is this the altitude at which the aircraft were flying when the Navy made its noise measurements?

1.a. Thank You

4.a. General Noise Modeling

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

Coupeville, WA 98239

Now I think both sides need to compromise and find some solutions. I live right alongside OLF on SR20. The jets are defining when they pass over my house as low as 400-500 feet, very close to the tops of my tall cedar trees (they even move when the jets pass). I believe that more elevation of the jets should be done before turning, safer for all and would help lessen the noise and shaking of my house. At present when they pass over, I can not hear the TV, radio or anyone talking. And having (froom the past) consecutive late night flights have caused me to go to a hotel in Oak Harbor to get some sleep. Seems the Navy could provide to us near/under the flight zone appropriate ear protection. Now I'm not against the Navy practicing their touch and goes, but I think some consideration can be made to relieve the situation as well as our community.



- 1.a. Thank You
- 12.k. Compensation to Citizens for Private Property
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation

Port Angeles, WA 98362-7009

As a taxpayer, as a resident of the Olympic Peninsula, and as a member of the North Olympic Group of the Sierra Club, I fully recommend NO expansion of EA18-G Growler operations at NAS Whidbey Island. I have read the comment letter submitted by [REDACTED] the North Olympic Group of the Sierra Club. For all of the deficiencies, omissions, and failures to properly implement NEPA, as cited in that letter, I join in asking the Navy to issue a revised, second draft EIS with a new public comment period. Thank you.

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.I. No Action Alternative

 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) 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
- 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

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,



1.a. Thank You

Oak harbor , WA 98277

Thank goodness for the us navy Love the sound of jets and the economy they bring along

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Oak harbor , WA 98277

Thank goodness for the us navy Love the sound of jets and the economy they bring along

Island County, WA 98239

My wife and I live one mile directly to the rear (SSE direction) of the OLF runway in a community in excess of 400 homes. As they line up on final, the aircraft are less than 500ft above our home. We knew we'd be dealing with FCLP activity when we built here in 2006 and considered it tolerable based on our prior experience with A6A, EA6A & EA6B aircraft. The E18G aircraft are significantly louder than all of the prior mentioned aircraft to the extent that it is painful to be outside when the E18Gs fly unless wearing professional level sound attenuation "ear muffs" and the vibration is palpable in our bodies if outside. 20 approaches in a one day period is challenging to live with. More than that would be intolerable and probably unhealthy. It is our desire that NAS Whidbey find a new location for the FCLP activity where residential exposure is eliminated.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 3.d. Arrivals and Departures
- 4.r. Nonauditory Health Effects

1.a. Thank You

Oak Harbor, WA 98277

We support your increased presence here on Whidbey Island and find that there is no scientific evidence to support the hysterical claims of some.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

I have lived in the Coupeville, WA area on Puget Sound for 16 years. I served in the Navy for 22 years in the JAG Corps and am very proud to have served. However, I am very disappointed and embarrassed by the way the Navy has failed to respond adequately to the health concerns of the residents of our island that are affected by the Naval air operations over Whidbey. Please protect our residents from further damage. [REDACTED]

1.a. Thank You

Olga, WA, WA 98279

/Users/[REDACTED]/Desktop/growler.docx

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 [Redacted]

4. City, State, ZIP Lopez Island, WA - 98261 [Redacted]

5. E-mail no [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
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 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

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've lived here on Lopez Island for over 40 years and the noise level can be terrible & are getting worse. This whole area - the San Juan Islands, the Olympic Peninsula - Whidbey Island should not be subject to this continuous noise. There must be other areas - less populated, & more remote than this pristine, beautiful area. Please consider the long range consequences of these decisions

coupeville, WA 98239

I believe the growlers' noise pollution poses numerous health effects, including mental health. Much was made of "shock and awe" at the beginning of the Iraq war, and loud music as a form of torture. The navy is subjecting U.s. citizens to that kind of impact. There is no escape from it; it is totally out of one's control. It is unbearable.

- 1.a. Thank You
- 3.a. Aircraft Operations
- 4.a. General Noise Modeling
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects

Orcas WA, WA 98280

1.a. Thank You

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

The effect of the noise of growlers on our life in the islands is significant. Please update your methods of measuring the effects on sound for the EIS. We trust that you will follow the law. Thank you for your consideration.

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) [Redacted]
3. Address [Redacted]
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.c. Socioeconomic Impacts
- 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 business is based on large part on tourism.
- My concern for individual wellness, peace of mind is primary.
- Growlers are not compatible!
- * How much time do students loose in an average day of learning?

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

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 [REDACTED]

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

3. Address [REDACTED]

4. Email [REDACTED]

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- Health effects from noise and low-frequency sound.
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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)

- 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
- 18.a. Climate Change and Greenhouse Gases
- 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.s. Health Impact Assessment and Long-term Health Study Requests
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- 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
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

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: More CO₂ released in the Air -
* ocean acidification

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:

* This central whidbey area is a historical, cultural, agricultural GEM. The Navy can certainly find someplace else to fly!
My farmers need to grow my food!
* Has the Navy ever done a cancer study for central whidbey?

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

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Nordland, WA 98358

Although I have strong concerns for the environmental impacts of the growler noise, I am addressing my own objections to the almost constant noise that I have been told to expect over my rural home on Marrowstone Island. When I mentioned this to a Naval officer sent to a meeting at Fort Worden to address local concerns I was told that it was impossible that I would hear loud noises because the growlers were at 10,000 feet by the time they flew over. I find this hard to believe since they take off so close to Marrowstone Island and the noise is quite loud. Has anyone actually come over to our island to experience what we on M.I. are experiencing? Please consider relocating this operation for our peace . I have no option to move. I have invested everything to retire here.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

3.b. Flight Tracks and Federal Aviation Administration Regulations

4.i. Points of Interest

Northridge, CA 91324

Hello, I am in the process of preparing to move to the Olympic Peninsula (Port Townsend, WA) this year. I just heard about the U.S. Navy's proposed plans to conduct war games and trainings in the Olympic National Forest with 5,000 "events" a year. I am submitting my comments in opposition to the war games and the overhead flying of very loud planes above the Olympic Peninsula due health, sanity, environmental, Native American territorial, US National Park, noise and chemical (fuel) issues. I understand there is an area on the coast starting just under the Ozette Indian reservation going south through La Push (Quilette Indian Reservation), through Hoh Indian Reservation, through the whole Olympic National Forest, thru Quinault Indian reservation and stopping right before Ocean Shores and then going as far inland as the Hoh Rain Forest Visitor Center where the Navy wants to conduct these war games. I was informed that the Growler Jet planes will take off from Whidbey Island and fly over to the above area. There will be periodic unannounced closures of the Olympic National Park in order to do mock warfare. 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. Ground equipment for the planes emit intense electromagnetic radiation associated with all kinds of other health concerns. Please do not move forward with this plan. I have many friends in Port Townsend and have plans to move there this year. On a related note, my previous job required me to visit NAS Whidbey Island several times a year. While spending the night there more than once, I was awakened and kept awake for hours by planes flying overhead in a very persistent an noisy manner. I understand that conducting flights and war games is necessary for the training of the U.S. Navy personnel, but I hope you can located a different location for this - one that will not cause such detrimental impact on so many people and wildlife. Thank you.

- 1.a. Thank You
- 1.d. General Project Concerns
- 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.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 9.a. Consideration of Tribes

Seattle, WA 98102

I'm concerned about the thoroughness and accuracy of the EIS for the Naval Air Station on Whidbey. I have close friends on the island, and my parents have been considering buying a house on Whidbey island. My friend says, "Environmental Impact Study wasn't even completed correctly. North Whidbey Island is now facing more than extreme noise pollution (and I'm not talking inconvenient jet noise, but relentless ear damaging noise that will make Coupeville almost un-inhabitable, and folks are trapped because they won't be able to sell their homes), and the whole Island is impacted because the sole source aquifer has been poisoned." This alone is making my parents reconsider their decision to retire on Whidbey island and they're looking now at other places to buy a home. Please don't let this get any worse - the pollution of the island's drinking water is extremely concerning, especially in context of the water crises happening in Flint and Corpus Christi. Please ensure this EIS is done in the most accurate and thorough manner and makes appropriate recommendations to protect the water and quality of life for Whidbey island.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.j. Property Values
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 4.q. Potential Hearing Loss

1.a. Thank You

Oak Harbor, WA 98277

I support Growlers at NAS Whidbey. I have lived close to the base since 1991. Plane noise is no problem. Not much difference between Prowler and Growler sounds. That includes low fly overs while driving on Highway 20 during touch and goes. I am proud to live near and to support the base. I worked in the office at Coupeville Middle and High School, which is not far from the OLF, for 15 years. I never heard any complaints either in the office or at faculty meetings from staff or from students about jet noise nor were there any low flights over the buildings during the years I worked there. I have attended several meetings where the anti-jet/anti-base people speak out. I have read their letters in the newspaper. Those experiences have led me to view the "anti" people as having a penchant for bombastic exaggeration, coarse attitude towards anyone with a different opinion and pronouncing as truths that which might meet their goal(s). The "if one says something often enough, long enough, loud enough" syndrome.

- 1.a. Thank You
- 3.a. Aircraft Operations
- 4.t. Noise Mitigation

Have had/visited a cabin N of NAS/Whidbey for 50 years. Does that qualify me as a voice to be listened to? Definitely have heard an increase in noise in the last 10 years. Planes have always spotted off our cabin for their 'touch-and-go' patterns -- lucky us! Sound pollution is today so loud conversation at anything less than 2 feet and screaming at each other is now impossible. For decades we were amicable neighbors -- not any more! Our ears are being RAPED with each pass and the passes are now constant. NAS/W has become the Neighbor From HELL. 1) Keep to your own property lines/air space. 2) Restrict # of planes, flight patterns, practice hours. 3) No night flights. 4) Dial down the noise pollution!

1.a. Thank You

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
depos@likkellcourtreporters.com

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

(425) 259-3330

6 (The personal identifiable information disclosure
7 statement was read to the following commenter.)

8 [REDACTED] I've heard the statement.

9 I had the opportunity to look at all of the new
10 data that's been presented here in behalf of the Navy's
11 efforts to help keep our country free and all of us safe.
12 I'm wholeheartedly supportive of the efforts, actions and
13 the necessary training cycles the Navy needs to carry out to
14 produce high quality aviators. Thank you.

15 * * *

federal way, WA 98023

Please conduct, and adhere to the results of an EIS for the increased jet traffic for Whidbey Island. It is not okay to contaminate the ground water, or deafen the residents, and render their properties worthless, and unsalable.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 11.a. Groundwater
- 12.j. Property Values
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 4.q. Potential Hearing Loss

Seattle, WA 98107

Just no. No to stress and injury inducing jet decibel levels damaging to nonhumans and humans on the Olympic Peninsula. No to 1300 gallons of jet fuel burned per hour by regular and large quantities of planes. Isn't anything sacred? Leave the treasure that is the Olympic Rainforest out of the Growlers range. No war games !

- 1.a. Thank You
- 18.b. Average Carbon Dioxide per Aircraft
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

Coupeville, WA 98239

When I attended the last EIS presentation in Coupeville, great emphasis was placed on the term "intermittent" with regard to the level of jet noise. The term was used to imply that non-continuous noise was much less harmful or disruptive than continuous noise, when in fact intermittent stress has been found to be very effective producer of psychological and physical damage. Additionally, I challenge the noise measurements provided, insist that you identify your instruments and their placement with respect to the aircraft creating the noise, and request that you provide actual measurements for locations claiming impact. Please also address the affected avian habitat--particularly effect on water quality--and migration patterns, given that the Ebey's Landing National Historic Reserve lies beneath the flight paths. For that matter, test our wells. And, one more thing, my understanding was that the switch to EA-18G was to eliminate old stock and also to employ unused newer stock. But I was told at the open house that Boeing is building new stock at approximately \$68 million/aircraft for the mission. I asked why (cheaper/safer) drones aren't being employed, since three Predator drones could each carry a 1K-pound radar pack. No one could answer the question. I requested earlier that the EIS compare the potential environmental impact of this alternative, including the dangers from accidents. Why was this not considered?

1.a. Thank You
10.l. Bird Migration
11.d. Per- and Polyfluoroalkyl Substances
17.a. Hazardous Materials and Waste Impacts
2.n. Alternatives Considered But Eliminated
4.f. Noise Measurements/Modeling/On-Site Validation
4.r. Nonauditory Health Effects

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

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:

Renton, WA 98058

I am opposed to the Growler jets flying over the Olympic Peninsula. The noise will harm birds and wildlife. The very sound of the jets can cause hearing loss. The jets produce an enormous amount of CO2 that our planet cannot afford.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 18.b. Average Carbon Dioxide per Aircraft
- 18.d. Washington State Greenhouse Gas Goals
- 4.q. Potential Hearing Loss
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Coupeville, WA 98239

There is no question that the Navy's EIS is out-of-conformity with NEPA by ignoring or distorting the facts relating to community health, hearing health and vibration and concussive effects of Growler noise on humans, fetuses, and Whidbey Island Bluffs. Subjecting citizens to the noise levels that warrant protection but is understated in not acceptable. Please do the right thing and find another site for FCLP's in an unpopulated area in WA, OR, or on a refurbished Aircraft Carrier anchored offshore. Increasing FCLP's at OLFC may well be catastrophic to Coupeville's economy, which is vastly different from Oak Harbor. Please address these issues and leave OLFC!! Lastly, if the U.S. gets into a war with China, why tempt them to destroy Whidbey Island by making NAS Whidbey the "Base" for ALL Growlers. Put half elsewhere, like on the East Coast.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.p. Local Differences in Economy
- 2.a. Purpose and Need
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Saint Ignatius, MT 59865

Please, the Olympic Peninsula is one of the last places where quiet and stillness is predominant. The last few year however, when we have been out there on vacation, we were alarmed at how many flyovers the Navy flew over this pristine, magical area. What you are doing is wrong. Do not destroy the peace of this place. More flights are absolutely not in the best interest of the communities surrounding the Park, nor the environment itself. STOP.

1.a. Thank You

7.d. Recreation and Wilderness Analysis and Study Area

February 13, 2017

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

Enclosed are my comments made with reference to the 10 Proposals contained in the United States Navy Draft Environmental Impact Statement (DEIS) for EA-18G "Growler" Aircraft Operations at Naval Air Station Whidbey Island Complex.

I would like to thank you for not extending the deadline more than one month. I have spent too much time living inside the cocoon that is a 1500 page draft EIS.

I also would like to point out that I have an electronic version of my comments, and if you would like a copy of that, I would be happy to provide you a copy via email.

Should you have any questions, you may reach me by email at [REDACTED] or by phone [REDACTED]

Sincerely,

[REDACTED]

1.a. Thank You
 1.e. Risk of Terrorist Attack
 12.h. Tourism
 12.i. Housing Access and Affordability
 12.j. Property Values
 12.k. Compensation to Citizens for Private Property
 12.p. Local Differences in Economy
 16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)
 19.d. Electronic Warfare
 19.f. Outlying Landing Field Coupeville Security Blocks
 2.a. Purpose and Need
 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.k. Range of Alternatives
 2.l. No Action 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
 3.e. Field Carrier Landing Practice Patterns
 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.g. Average Annual Day/Average Busy Day Noise Levels
 4.j. Other Reports
 4.l. Points of Interest
 4.m. Supplemental Metrics
 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
 4.t. Noise Mitigation
 7.a. Regional Land Use and Community Character
 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
 8.a. Cultural Resources Area of Potential Effect
 8.g. Mapping and location of Ebey's Landing National Historical Reserve and Central Whidbey Island Historic District

PUBLIC COMMENTS
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT,
PREPARED IN 2016 BY THE UNITED STATES NAVY,
FOR THE EA-18G “GROWLER” AIRCRAFT OPERATIONS AT
AULT FIELD AND AT OUTLYING LANDING FIELD-COUCPEVILLE, WA

The public comments were prepared by

██████████

February 12, 2017

FOREWORD

Each of the 18 Sections comprising My Comments are a direct result of the experiences of living for 14 years beneath thousands upon thousands of Prowler and Growler FCLP flights at OLFC, listening to the roar of Arrival and Departure flights executed while Navy Aircraft have entered or exited from the closed-loop pattern of flying while engaged in FCLP operations, and listening to the over-flights of aircraft departing or arriving at Ault Field in connection with flights at higher altitudes than those involved with FCLP's; (2) while attending the public scoping meeting held in Coupeville in December 2016; and (3) spending well over one month attempting to read, comprehend, and understand the DEIS' 1,500 or so pages, and (4) reacting to the request for public comments by the Navy, and writing these comments.

My Comments reflect having lost most of the respect that I had gained throughout my adult life, which includes having been being stationed two years at NAS Jacksonville as an Officer in the United States Air Force, growing up with my own individualized Ivory Tower, and having enjoyed the last 14 years flying with my best friend around the Pacific Northwest in a Pilatus PC-12, Bell Jet Ranger Helicopter, and an amphibious de Havilland "Beaver." It is safe to say that I have a love of flying. Nonetheless, I have attempted to put my "emotions" aside and deal with reality as experienced and viewed in the context of my experience of living on Kineth Point, which lies midway between Long Point and Snakelum Point on Whidbey Island near Outlying Landing Field Coupeville (OLFC).

I have not been involved with any group or organization in any respect on Whidbey Island, other than being a supporter of Meerkerk Rhododendron Gardens near Greenbank, and the Whidbey Island Chapter of the American Rhododendron Society. During our time on Whidbey Island, we have transformed an undeveloped lot into one of the finest Gardens on Whidbey Island. Last year, we were one of the host gardens for the Whidbey Island Garden Tour, and approximately 650 people visited our garden during a six-hour window. Our Garden was planned and developed with self-help and we have spent possibly more time than anyone in our backyard, during all of our year on Whidbey. That is important because we gained a great deal of information watching, listening and becoming aware of FCLP flights, pilot idiosyncrasies and tendencies, and altitudes of close-in flying.

I regret that on occasion the "tone" in My Comments is a bit direct, or sharp, or one of frustration, but if the Navy is offended, it is the Navy's fault. Too often I have learned that communication with the Navy leaders has been one-way. The Navy does not listen well. Maybe that is a derivation of Command located other than at and higher than Whidbey NAS. Whatever the case may be, it's time for a change. I hope the Navy can hear my voice and attempt to understand the reasoning in these, My Comments.

Permission to use any portion of My Comments for any purpose will be accorded appropriate consideration, and written permission may be granted upon request therefor sent to [REDACTED], Coupeville, WA 98239.

February 12, 2017

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This document (My Comments) was prepared in response to the Invitation for Public Comments on the Draft Environment Impact Statement (DEIS) for EA-18G "Growler" operations at NAS Whidbey Island Complex, with primary focus upon the continued use of OLF Coupeville (OLFC) as it relates to Coupeville and the Civilian Communities surrounding OLFC.

For convenience to the reader, My Comments are segmented and compartmentalized by subject matter and are referred to as Sections. Each section, thus, is separate and distinct. The Sections contain the following subjects:

- Section 1. ***NEPA: The Federal National Environmental Policy Act of 1969 and the United States Navy***
- Section 2. ***DNL and its Value.***
- Section 3. ***Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy?***
- Section 4. ***DEIS' Economic Benefits to Coupeville & Environs Means Negative Impact Burdens.***
- Section 5. ***Electronic Warfare Against One Individual? Whose Actions Caused Persistent Destruction Over Time of Electronic Equipment in my Home? A Documentary Accounting.***
- Section 6. ***Alternatives to OLF Coupeville.***
- Section 7. ***DEIS Bias: Benefits from NAS Whidbey.***
- Section 8. ***DNL, NIOSH, & OSHA: On Noise Exposure Doses.***
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- Section 12. ***Hearing Health Issues and Growlers, Until F-35's Arrive.***
- Section 13. ***Growler Noise and Community Health.***

Section 14. ***Navy Avigation Easements Near OLFC: A Bad Example of Navy Leadership and Community Interaction.***

Section 15. ***Noise Abatement.***

Section 16. ***The Navy, NEPA , and Predictable Findings of “No Significant Impact.”***

Section 17. ***“Issues” of Navy Leadership and Accountability.***

Section 18. ***The Navy’s Draft Environmental Impact Statement for the Growler is NOT an Objective Document.***

SECTION 1.

NEPA: THE FEDERAL NATIONAL ENVIRONMENTAL POLICY ACT OF 1969 AND THE UNITED STATES NAVY

The federal National Environmental Policy Act of 1969, as amended (hereafter NEPA), declares "a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man". 942 U.S.C. 4321). The Navy and all branches of the Armed Forces of the United States are subject to NEPA, as are all federal agencies, including the Federal Aviation Administration, which governs civilian and commercial aircraft ventures and endeavors.

In the NEPA, the Congress further declared "that it is the continuing policy of the Federal Government, in cooperation with the State and Local governments, and other concerned public and private organizations, to use all practical means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." That policy is said to be in recognition by Congress of "the profound impact of man's activity on the interrelations of all components of the natural environment" . . . including "population growth" and "new expanding technological advances" . . . and "further recognizing the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man."

My reading of this law and the policy behind the law is that it is an attempt to impose upon entities such as the Navy the monumental administrative process to give due regard and respect to all persons or entities that have an interest in whatever the Navy is proposing. There are more interests involved in this DEIS than merely Navy interests and NEPA requires those interests to be given due regard and respect, but assumes that the Navy's proposals and self-analysis will be defensible in the light of other moral or legal requirements expressed in NEPA, as indicated above, and in the Constitution of the United States. In that regard, all laws of the United States and the States, as well as the process of administering or interpreting federal laws, are subject to the requirements of the United States Constitution. This includes the manner in which the United States Navy administers and applies federal laws, including NEPA. While the Navy certainly must give strong, unyielding attention to its mission and the welfare of the United States, it does not mean that there should be zero consideration by the Navy to alternative locations for the conduct of FCLP' operations conducted by NAS Whidbey, if conducting them at the two aircraft landing facilities available to and under the control of the Navy would run afoul of, or be contrary to, or in conflict with, the mandates of NEPA or the Federal Constitution. Especially, as here, when the Navy is proposing to increase the number of FCLP's per year at OLFC from 6,100 up to 35,100, a monstrous increase of up to 575%, not including any FCLP's that would occur if the Navy also contracts with foreign governments to train foreign pilots to land on aircraft carriers at OLFC. I point out, parenthetically, that the population of Whidbey Island already reflects the presence of at least 50 families of Canadian pilots, and there exists Navy news that dozens of Growlers have been purchased by Australia and that the training of those foreign pilots might well occur at OLFC as well. The Navy's

expectations, inherent in its DEIS, of imposing a catastrophic burden upon the economy and unique longterm lifestyle that is Coupeville and its environs (I note that Coupeville is the second oldest town in the State of Washington) is an absolutely unrealistic expectation on the part of the Navy. It also represents a direct violation of federal law and policy reflected by and in the NEPA, indeed, is an indictment of the lack of objectivity and the lack of consideration of and for the rights of citizens, as required by NEPA and the United States Constitution, as discussed elsewhere in My Comments.

Ask the Navy why they don't just add Navy Officer housing on Navy lands around OLFC and make that housing available or mandatory to Growler Pilots and their families. One answer is that that would be silly because there presently are no Navy Pilots or their families who have chosen to live anywhere close to OLFC. Indeed, each of the Navy Officers involved in the so-called "public scoping" meeting conducted in December 2016 in Coupeville (other than the Commander of NAS Whidbey whom I believe is obligated to live on NAS Whidbey, but I was unable to verify that assumption), as well as the community representative from Virginia, was asked if they lived near OLFC or any OLF and the answer was emphatically "no" for each person. The Officer from Virginia indicated that she commutes 11/2 hours each way to work and back, to avoid FCLP's.

Then, why oh why does not the DEIS contain a discussion of efforts made to find alternative OLF sites, so that even NAS Whidbey might be relieved of any FCLP's? Thinking outside the proverbial box is an essential ingredient to satisfy the rigorous attempt by NEPA to keep in balance the relative tensions of the needs of the Navy and the rights of Americans not to be subjected to levels of noise that is bound to cause greater life-endangering health conditions and hearing losses, as well as untold, undiagnosed environmental concerns, including the poisoning of ground water drawn by civilians' water wells that already exceeds federal standard for more than one poison used by the Navy or its contractors at the OLFC.

Instead, as administered by the Navy, NEPA permits the Navy to select the data that is presented in a DEIS regarding its proposal (In this DEIS it is presenting 10 variations of its plan), permits the Navy to select the metric by which to flavor the data, analyze the data, present the data to the public. I note in particular that the DEIS is in a form containing an overwhelming amount of highly technical data, much of it being repetitive and encompassing 1500 or so pages, thereby making it unnecessarily difficult for the average person like me to comprehend and understand. For example, the DEIS refers back to numerous Tables, Figures and Charts and there are two volumes that comprise the DEIS and each volume contains 8 to 10 separate and lengthy subparts, as a Summary, Chapter, or Appendix, comprising about 1500 pages or so.

One hardcopy of the DEIS is made available in the Coupeville Library for the approximately 6,000 or so people who live in Coupeville or its Environs. The point is that the DEIS must be read in the online version, and reading or referring back to a particular Figure, Table or Chart, to understand the Navy's Narrative in the DEIS is time consuming, awkward, and nearly impossible, but maybe that also is a Navy strategy and tactic, in order to reduce meaningful analysis and public comment. Oak Harbor Library has two copies, which is understandable. Based on the public turnout for the scoping meetings, maybe Coupeville should have had more? It also is great that the following communities also received the same number as Coupeville: Lopez Island, San Juan Island, Orcas Island, Camano Island, Geumes Island, Port Townsend of Jefferson County, Jefferson County Library, Port Angeles, Sedro-Wooley, Sequim, Bellingham, Seattle, Mount Vernon, La Conner and Anacortes. I draw no conclusions from this information, as there is no need.

The DEIS also signifies Navy bias by the way it is written to suggest that none of the Navy's proposals would have a significant impact on the status quo, and to make a final decision regarding the 10 variations. There also is no independent analysis by any person or entity qualified to perform an independent analysis of the data or the pre-conclusions set forth in the Navy's DEIS. Please assume, just for a moment, that there are significant problems with the Navy's proposals, either in moral or equitable terms or that the DEIS contains seriously flawed information and the Navy relies on that information. Then consider the reality that the Navy, in administering the mandates of NEPA, imposes the monstrous burden upon the person who objects to the Navy's proposals, of proving, in a short period of time, that the proposal is immoral, inequitable, unconscionable, unlawful, fatally flawed, or whatever. That is a process that may subject civilians who live in Coupeville or its Environs close to OLFC to burdens and costs in violation of the Substantive rights of both Procedural and Substantive Due Process of Law guaranteed by the Fifth Amendment to the United States Constitution as well as the "Unlawful Takings" provision of the Fifth Amendment.

That NEPA process, as proposed in the DEIS to be administered by the Navy does not ensure either Procedural or Substantive Due Process as required by the Fifth Amendment to the United States Constitution to the civilians destined to be seriously impacted, culturally and economically, as well as collectively and individually. Further, it is highly likely that implementation of the Proposals would constitute "a "taking" of private and perhaps even public properties without just compensation, as required by the Fifth Amendment.

Some of the reasons why that is a near certainty, based on the so-called facts contained in the DEIS, are set forth in other of My Comments, attached.

If you would like to read another draft EIS, prepared pursuant to NEPA, that reflects a cooperative and flexible attitude on the part of the preparer, I invite you to take a look at Hawaii Volcanoes National Park's Mission Critical Administrative Aviation Plan and Environmental Assessment (plan/EA) for managing the use of administrative aviation over the park, released in February 2014. One of its statements is that it "provides a decision making framework for managing the Hawaii Volcanoes National Park" and even contains an upfront "Preferred Alternative."

SECTION 2.

DNL and ITS VALUE

It is often said and quoted that “noise is defined as unwanted sound. In other words, noise is sound that disturbs routine activities or quiet, and/or causes feelings of annoyance. Whether sound is interpreted as pleasant (e.g., music), or unpleasant (e.g., jackhammer) depends largely on the listener’s current activity, past experience, and attitude toward the source.”

“Sound is transmitted by alternating compression and decompression in air pressure. These relatively small changes in atmospheric pressure are called sound waves. The measurement and human perception of sound involves two physical characteristics—intensity and frequency. Intensity is a measure of the strength or magnitude of the sound vibrations, and is expressed in terms of the sound pressure level (SPL). The higher the SPL, the more intense is the perception of that sound. The other characteristic is sound frequency or “pitch”—the speed of vibration. Frequencies are expressed in terms of cycles per second or hertz (Hz). Low frequency sounds might be characterized as a rumble or roar, while high frequency sounds are typified by sirens or screeches. Noise analysis accounts for both of these characteristics in the units used to measure sound.”

“The human ear is sensitive to an extremely wide range of sound intensity, which covers a relative scale of 1 to 100,000,000. Representation of sound intensity using a linear index becomes difficult because of this wide range. As a result, the decibel—a logarithmic measure of the magnitude of sound—is typically used. Sound intensity is measured in terms of sound levels ranging from 0 dB, which is approximately the threshold of hearing, to 130 dB, which is the threshold of pain.

“Because of the logarithmic unit of measurement, decibels cannot be added or subtracted linearly . . . however, the following apply:

- If two sounds of the same level are added, the sound level increases by approximately 3 dB. For example: 60 dB + 60 dB = 63 dB.
- The sum of two sounds of a different level is only slightly higher than the louder level. For example: 60 dB + 70 dB = 70.4 dB.
- Sound from a “point source,” such as an aircraft, decreases approximately 6 dB for each doubling of distance.
- Although the human ear can detect a sound as faint as 1 dB, the typical person does not perceive changes of less than approximately 3 dB.”
- A 10 dB change in sound level is perceived by the average person as a doubling, or halving, of the sound’s loudness.”

“A-Weighted Decibel. Humans are most sensitive to frequencies near the normal range of speech communications. “A-weighting” reflects this sensitivity by emphasizing midrange frequencies and de-emphasizing high and low frequencies (see Exhibit F-3). Since the A-weighted decibel (dB) provides a better prediction of human reaction to environmental noise than the unweighted decibel, it is the metric most frequently used in noise compatibility planning.”

(https://www.faa.gov/airports/airport_development/omp/eis/feis/.../Appendix-F.pdf)

One of the features and factors for assessing and evaluating OLFC, in the context of a proposal that would increase the number of FCLP operations from 6,100 by up to 575 percent to 35,100 FCLP operations per year, is the use of “data” to quantify the noise levels that would result from the approval of one of the 10 proposals contained in the DEIS. The DEIS declares that “the DNL metric is the energy-averaged sound level measured over a 24-hour period, with

a 10dB nighttime adjustment.” (See Sec. 3.2.2.1, Volume 1, DEIS). While “noise”, such as Growler noise, can be and has been measured using sound measuring equipment, for the purposes of this DEIS or any other of several DEIS’s prepared and by the Navy for other proposals involving the Prowler and the Growler as well as other aircraft and the 2005 Air Installations Compatible Use Zones (AICUZ), no actual noise measurements have been collected, or at least not referenced in this DEIS. Instead, projections of Growler noise by computer software was used, first to project noise that is subsequently used to project and present “noise contours” for the geographical area subject of the DEIS. Thus, noise contours are included in the DEIS to indicate projected levels of noise within each contour of both Ault Field and OLF.

More specifically, the DEIS indicates that the “DNL contours are calculated based on modeled aircraft noise events using Noisemap [a software program used by Wyle Laboratories, the private business hired by the Navy to do the noise and contour modeling. Thus, it follows that the validity of the data upon which the choice of one of the 10 Alternative Proposals will be based, assuming that choice has not yet been made, is dependent upon the quality or of the data that was fed into the Noisemap computer program as well as the variable settings of that variable and flexible software. Neither the data nor the variables are disclosed in the DEIS or otherwise offered by the Navy for review or analysis.

The Navy, in the DEIS, goes on to say that the U.S. Department of Defense uses Noisemap as the accepted standard noise modeling program for assessing potential noise exposure from fixed-wing aircraft; and that Noisemap is routinely updated and validated through extensive study to provide the best possible noise modeling results for these applications. Again, it says nothing about the integrity of the data that is fed into Noisemap, nor about the variables within the software.

In my one-man attempt to read and digest the DEIS, I made a mental note to do some “digging” to see why there are so many apparent attempts made in the DEIS to say that Noisemap is the most reliable way to handle the data. My search found some holes, that may be significant. Lastly, no computer program in terms of sound exposure is anything but guesswork, some of which likely is educated or experienced but none of which involves real honest-to-goodness facts. As a “tool” it can be used to support a desired conclusion or it can be fully objective. If it is the latter, then there should be no biases.

A 3-page document I discovered online declares that it was written by Wyle Laboratory researchers and states as follows: “The following section was compiled by researchers at Wyle Laboratory” but curiously the document has no heading, Wyle Laboratory logo, or author-name attribution, and is not dated (which in an of itself is no different from numerous Navy website documents I have read in an endeavor to better understand “sound”. Especially in this new, unsettling era of “fake news” and “alternative facts”, I thought that should be noted. Further, the document doesn’t state the purpose of the article and draws no conclusions. However, I would characterize the purpose of the document as a “conscience” statement of a group of Wyle researchers, decrying the continued reliance by entities such as the Navy upon a 38-year old private study (by Schultz), in view of the fact that even the Author of that 38-year old study, Schultz, has updated and clarified the old study with a much newer study, as indicated below. I mention it, however, because in the DEIS, the lowest 24-hour average DNL-level used for drawing noise exposure contour lines in the DEIS is the range of 65 to less than 70dB DNL. In the DEIS, the sound/noise contours for the various Alternatives under consideration includes three ranges: 65 to less than 70 dB DNL, 70 to less than 75 dB DNL, and equal to or greater than 75 dB DNL.

I would also point out that there is an article, published in the Noise Control Engineering Journal (Jul-Aug 2005), which summarizes the 2005 positions of numerous Federal entities that recommend minimum day- night average sound levels of about 65 dB, as in the DEIS. He also

points out that the EPA is one of the agencies that recommend a DNL of 55 dB “as the level requisite to protect health and welfare with an adequate margin of safety”; the the National Research Council, Committee on Hearing, Bioacoustics, and Biomechanics has selected DNL as the preferred noise metric and with a level of 55 dB to represent the beginning of noise impact in residential areas; and basically the same result was reached and recommended by the Federal Energy Regulatory Commission, the World Bank, the American National Standards Institute (ANSI), and the International Organization for Economic Co-operation and Development, except that it would use a DNL limit of 50 dB in rural areas, like central Whidbey near the OLFC. The World Health Organization (WHO) recommends “a 16-hour daytime average sound level of not more than 55 dB and, approximately an 8-hour nighttime average sound level of not more than 45 dB to prevent “serious annoyance” in residential areas (but if you add a 10 dB penalty, as is customarily done for nighttime calculations that would increase the 45 to 55 dB, except the average limit would be for an 8-hour period of time.

The Navy follows the DoD example of using the 65 dB DNL, as first set by the Federal Interagency Committee on Noise (FICON). Paul Schomer, in his article, declares that “FICON generally understates the average percentage of a community that is highly annoyed. At a DNL of 65 dB, the average percentage of a community that is highly annoyed by aircraft noise is 28% . . .while the corresponding prediction by . . .FICON . . .is 12%.” The 65 DNL, preferred by the Navy, includes zero margin of safety for Civilians living near OLF, per the EPA. That is hardly comforting.

Back to the DEIS. In support of the decision to include only three DNL ranges, the DEIS states that “DoD recommends land use controls beginning at the 65 dB DNL level” and “research has indicated that about 87 percent of the population is not highly annoyed by outdoor sound levels below 65 dB DNL . . . [and that] “most people are exposed to sound levels of 50 to 55 or higher on a daily basis.” In other words, there is virtually no reason to include a lesser range because it would not apply to a significant percentage of the affected population. Then, the DEIS draws this conclusion “[t]herefore, the 65 dB DNL contour is used to help determine compatibility of military aircraft operations with land use, particularly for land use surrounding airfields, and in the lower threshold for this analysis.” That conclusion does not follow logically from the preceding quoted sentence to which it is intended to reference. The DEIS doesn’t mention the fact that the 38-year old Schultz study was **not** a consideration solely of aircraft noise. Indeed, it combined with aircraft noise, annoyance surveys involving road noise and railroad noise, both of which have been determined in numerous studies to be less objectionable than noise emanating from aircraft, especially military aircraft.

It would seem that the intransigence of the Navy, to move from outdated and invalidated studies, has something to do with other factors than community annoyance. Like forcing unconscionable levels upon Coupeville and its Environs even when there is no economic benefit and when that Navy action may well devastate Coupeville’s economy (See Sections 3 & 4, My Comments). I also point out that during the same time that commercial aircraft has become quieter, military aircraft has become faster and louder. Noise is a factor in the design of commercial aircraft. Noise isn’t a design element for military aircraft.

In any event, the continued use of a 65-70 DNL is a reality notwithstanding it’s scientific status as a too-high minimum standard, and notwithstanding that fully **28% of people will be “highly annoyed”** by noise from aircraft within the 65-70 dB DNL range, which is more than double the percentage referenced in the DEIS (100% less 87% not highly annoyed in a range below 65 dB DNL = 13% that are highly annoyed). The new studies also say that for **“an outdoor DNL of 55 dB, the percentage highly annoyed” is “12%” and that for a DNL for 60dB is 19 percent**, which is quite a bit higher, more than double the percentage of people said in the DEIS to be highly annoyed for the 65-70 dB DNL. Notwithstanding the DEIS use of 65-70 DNL as the threshold for “highly annoyed, this reference in the DEIS to the 55 dB DNL level seems that the DEIS maybe wants to use the higher level, but is worried about not using the lower 55

dB DNL level. There is no logical reason for the reference in the DEIS to the 55 dB DNL level in the context in which it appears. Further, the DEIS makes no mention of how any of the DNL levels relate to actual decibel levels, or how DNL's are calculated.

I point out that the contour lines for a 55 dB DNL (which was sufficiently important for the Navy to attempt to discredit or disregard its use) as quoted and indicated above, would show significant impact for OLFC under Proposal 1A, 2A, or 3A,. It would show that imposing 80% of all FCLP operations upon the neighborhoods surrounding OLFC as per Alternative 1, Scenario A, would place the entire city limits of the Town of Coupeville, as well as the area known as Juan de Fuca, which is on the West shoreline of Penn Cove (the business district of Coupeville is on the East side of Penn Cove) in all likelihood, within the 55 dB DNL range, as well as additional properties south of Runway 32. In contrast, the contour lines drawn for 60 dB DNL under the No Action proposal would continue to exclude some of the population of the Town of Coupeville (see, for example, the dotted dark blue contour lines in Figure4-2.5).

A comparison of the contour lines drawn for Ault Field and OLFC is another example of how the DEIS is biased in favor of supporting a decision to impose a far greater noise burden upon the OLFC vicinity, regardless of which of the four Alternatives is selected (i.e., the so-called "No Action Proposal", which literally is an Alternative for the reason that 6,100 FCLP operations at OLFC has never been approved under the requirements of NEPA, or Alternative 1, 2, or 3). Notice that the contours drawn for Ault Field have "lobes" that extend out for about 10 miles, which gives the Ault Field contours a "star" kind of look. No similar lobes were drawn on the contours for OLFC. The DEIS data suggests that the lobes for Ault Field are drawn because of the departure flights and arrival flights at Ault Field for Growlers that fly to and from OLFC, and thus also are reflected in Table 4.2-1, which contains "Estimate of Acreage and Population within the DNL Contour Ranges" for Ault Field and OLFC." To the extent the "lobes" are drawn over land near Ault Field, the acreage and population affected under the lobes at Ault Field are increased to that extent. You might say that those flights should count and be reflected in the Ault Field contours. While I don't disagree, there is no logical reason the same lobes would not apply in the contours drawn for OLFC, if the proper data had been fed into the NOISEMAP program. Consider this: For every FCLP-related flight arriving at Ault Field (and is reflected in the contours), where that flight exited a "closed loop" FCLP session and departed OLFC, but is not counted or reflected in the contours for OLFC even though it is an actual flight and is in addition to the closed loops entailed in a FCLP. Similarly, flights that depart Ault Field (and that are counted and reflected in Ault Field contours, acreage, population and other operations flights, per Table 3.1-3 and Table 4.2-1) and that arrive at OLFC are not counted, even though they are actually noisier than FCLP loops because arrivals generally are flown at a considerably higher velocity than flights in FCLP closed-loop patterns and are well under 500 feet. Footnote 3 to Table 3.1-3 in the DEIS, reads as follows: The term "Other Operations includes Touch and Goes, Depart and Re-enter, Ground Controlled Approaches, and Carrier Controlled Approaches" at Ault Field, but not at OLFC. Ault Field is credited with 53,100 Other Operations flight per year and OLFC is credited with ZERO Other Operations flights involving Growlers. The number per year would be the number of Sessions flown on a Flying Day multiplied by the number of Growlers in each Session. If the data was intended to be slanted to make the facts seem different from what they really are, the DEIS reflects more than one way to accomplish that. This makes the DEIS, in my opinion, a disingenuous Navy document.

The presence of lobes for Ault Filed but not OLFC increases the number of acres to which the sound contours apply. In the case of Ault Field, the lobes are over both land and water. I wouldn't be surprised if you told me that water is included as acreage. But that would be ridiculous as a basis of concluding that the contours affect more acreage around Ault Field than OLFC. However, apparently it is a big deal to at least one former Navy Commander. Former Commander Nortier, in a Declaration filed in the United States District Court for the Western District of Washington in an action against the Navy, regarding the use of OLFC, declared that "[t]he population surrounding Ault Field is greater than that surrounding OLF

Coupeville, which means noise impacts from aircraft operations at Ault Field impact a greater number of people than at Coupeville.” My reading of that quotation is that former Commander Nortier believes it would be more just to saddle Coupeville than Oak Harbor with more of a FCLP burden because there are more people in Oak Harbor compared to Coupeville. He doesn't mention categories of people, for example military or civilian, employees at NAS Whidbey, military personnel stationed at NAS Whidbey, time of the day, or any other pertinent fact to give clarity if not credence. He also does not mention comparative economic differences between the two communities, the fact that one is virtually totally dependent upon NAS Whidbey for jobs, school money and housing rentals while the other has virtually nothing to do with NAS Whidbey other than getting the noise from FCLP's. He doesn't mention the fact that Coupeville is substantially reliant upon Tourism to bolster its economy and its unique nature as the second oldest town in Washington or that tourists will flee if more noise is dumped involuntarily upon Coupeville.

There's more. The DEIS contains estimates of the “Estimated Aircraft DNL at POI for the Average Year No Action Alternative” (Table 5-5). I searched in the DEIS for similar estimates for each of the other Alternatives and Scenarios (9 in total) and found none. I can't explain. Those estimates might be revealing as to whether increasing the FCLP's at OLFC by as many as 575 Percent of 6,100 would move the DNL year-long average, or expose the average used simply as a way to dilute beyond belief the actual noise impact, in that context. In any event, the highest POI on the list for any location listed is a POI near Ault Field, namely Sullivan Road, which shows a quite high DNL of 90. It is difficult to comprehend, in a more familiar decibel context, just what a 90 dB DNL means. Nothing in the DEIS makes that easy. It is as though the Navy prefers to obfuscate the real effect of a 90 dB DNL. In contrast, the highest DNL for any POI location for OLFC is Admirals Drive, an area with scores of houses in the neighborhood, with a DNL of 79.

We all know that Admirals Drive (the actual terminology used is “Admirals Drive and Byrd Drive”, which is an intersection in the community of Admiral Cove, a community of about 400 homes) is a virtual small city by itself. We also know that Admirals Drive is located just South of Runway 32 and is subjected to very high levels of sound measured in decibels. The DEIS says that the highest level, expressed in decibels is 118 decibels, SEL (sound exposure level), which you can find an explanation for online, quicker than in the DEIS. For Sullivan Road the SEL is 121 dB SEL. What do we know about Sullivan Road? It is adjacent to Runway 25 and close to the intersection between Runway 25 and Runway 07 and is very close to the northerly geographical boundary of NAS Whidbey. Comparing its overall impact on people living below the POI location, one Internet site says there are **three** people who live on Sullivan Road who are registered to vote (so there may be a couple more unregistered people?). In The DEIS, Sullivan Road is the closest POI to any runway at Ault Field or at OLFC. There is no POI at OLFC that is as close to either Runway 14 or 32. But there is a road, similar in geography to Sullivan Road, namely Keystone Hill Road, which is just to the west of the OLFC westerly boundary (and it only has maybe a dozen houses, too).

It is also an interesting fact that the average DNL for the 5 POIs near Ault Field is 68.2 and the average for the four at OLF is 63.5. I know that DNL numbers don't lend themselves to averaging in pure mathematical terms because the measurement of a decibel is not linear. Sound loudness doubles every 3 dB, so it would be essential to compare apples to apples instead of to prunes. In comparing Ault Field's 60 dB DNL contour line with that of the 60 dB DNL for OLFC, it would seem to me that the comparison would be totally, absolutely flawed unless careful consideration is given to the comparative locations of the POI's in geographical terms. Otherwise, what would prevent someone from looking at contours and saying “fix them to show that the contours are wider and have more adverse impact at Ault Field.”

It is no big deal for a computer software program to have settings that would equalize the POI's in numerous ways. But what we know is that the POI's between Ault Field and OLFC yield

differing results from which people like former Commander Nortier drew conclusions. I'm not saying the figures are disingenuous, but I'm not saying they are not, either. But I will say that given the superficial narrative of former Commander Nortier, made when he was the Commander of NAS Whidbey, is at best puzzling and feeds my opinion that the DEIS is not a document in which I have much confidence.

Another aspect of my suspicions about the validity of the contour lines drawn for purposes of the DEIS results from a visual analysis of the POI's. For example, It is difficult to understand how the DNL for Skyline, a residential neighborhood POI on Fidalgo Island near the northwest corner of Fidalgo Island and situated several miles from Ault Field and approximately 20 miles from OLFC has a higher DNL, 56 dB, for the No Action Alternative than the Cox Road and Island Ridge Way POI near OLFC, where the computer-prescribed DNL is said to be 51. There are no FCLP flight tracks close to that the Skyline POI, although the Figure 3.1-3, that shows arrival and departure flight tracks for NAS Whidbey, shows departure flight tracks near Skyline. But even if the DNL for the Skyline POI entered into the DNL calculation, but similar flight tracks over the OLFC POI's are not data included in calculating DNL for the OLFC POI's, which I believe to be true, then that would be further evidence that the DEIS is a biased document with a hidden agenda and is a disservice to the Community of Coupeville and its Environs.

It is further evidence that the impact of all of the proposals and scenarios are biased in favor of imposing the biggest noise burden possible upon Coupeville and its Environs and making it seem that the burden is slight and of "No Significant Impact." In that regard, I wish to point out the, in Section 3.2.4.1 of the DEIS, the narrative states, after describing why the "lobes" for Ault Field contours extend 6 to 10 miles from the four Ault Field runway endpoint, this about OLFC: **"The DNL contours at OLF Coupeville are generally driven by the FCLPs conducted at" OLFC** [Emphasis added].

For all of OLFC, there are no arrival or departure flight tracks shown on any figure provided in the DEIS, although as discussed above, there are both arrival and departure flights that make a heckuva lot of noise because of low altitude and higher velocity, as compared with FCLP closed loop flights, during the arrival at OLFC and during the departure from OLFC and often that noise level lingers and lingers. It isn't silent. Moreover, at Cox Road, there would be noise from FCLP operations when Growlers are using Runway 14 and execute a left turn after the "Go" portion of the FCLP. The narrative for the discussion about DNL Noise Contours also contains a footnote 6, which reads "These DNL Noise contours were modeled specifically for this analysis to determine the change in the noise environment related to the Proposed Action; therefore, they differ from the official noise contours currently on record, discussed in Section 3.5.1.2, Regional Land Use and Land Use Controls)." Shouldn't they be modeled both ways, for comparative reasons?

Again, to me, the DNL's attributed to the POI's for Ault Field and for OLFC suffer in terms of credibility.

Another unexplainable aspect of the POI's is that there are 5 selected for Ault Field and 4 for OLFC. Of those selected for OLFC, 3 of the 4 are outside of the Runway 32 that has been used in the past for 70% of the FCLP's. at OLFC Someone chose 3 of 4 in the area that gets 30% of the FCLP's? That is a significant reason for why the relative average for OLFC is 4.7 dB DNL lower than for Ault Field. Considering that the intensity of sound levels double for every 3 decibels, 4.7 dB DNL is significant.

My suspicion is that there are many additional "issues" associated with the data resulting from NOISEMAP and the computer. It is highly likely that I am not smart enough nor do I have sufficient time or energy to discover all of them. Someone, with authority needs to step up and tell the Navy that enough is enough. I wish I had that authority.

Another aspect of the Science of using DNL's in the context of military aircraft is that the primary force in combatting aircraft noise has been the FAA. The FAA has been very effective in effecting substantial reductions in commercial airport noise at the same time military aircraft noise has been increasing. As discussed elsewhere in My Comments, the noisiest commercial aircraft, over time, has been replaced. Military aircraft noise has never been more intense. Indeed, the EA-18G is at the top of the Noisiest Military Aircraft, along with the F-18E/F, which is the airframe used in building EA-18G Growlers. My point here, merely is to point out that the FAA metrics and noise discussions are no longer directly translatable to understanding the dimensions of noise from military aircraft. I located a map from the Massachusetts Institute of Technology (MIT) website that suffices to compare the noise contours for two commercial airports North Chambers Field and Norfolk International Airport, with two Navy "airports" (NAS Oceana and NALF Fentress.) The contours for the commercial airports shown in DNL are absolutely dwarfed by the contours for the two Navy facilities. As you consider the use of contours in the context of OLFC, the effect of the noise cannot be understood in the context of any vision of noise regarding your experience with commercial airport. One context is Goliath, the other little David. One is a Giant Giant, the other not so much See Map, attached to this Section). The actual reality of the burden imposed upon Civilians living below FCLP's at OLFC is tantamount to living with noise terror.

Lastly, I would like to take a look at the concept of calculating DNL for the purpose of drawing attention to the many variables that go or should go into that calculation. Some general principles are these, derived from Quiet Skies NorCal 2016, from their website:

- In a normal environment, a 3 dB change is the general threshold of detectability.
- An increase of 3dB is a doubling of the sound energy.
- An increase of 6 dB is an increase in sound energy by a factor of 4.
- An increase of 10 dB is an increase in sound energy by a factor of 10

In a typical case of comparing two or more DNL's or calculating even a single DNL, there are several variables in that calculation, for an EA-18G, and include:

- The noisiness of the Growler at a certain distance, such as the distance of a POI from a Runway, measured in decibels.
- A penalty if the Growler is using thrust or engaged in a powered landing, to contrast a Growler flying with less throttle, usually up to 10 dB, but individual parameters for the EA-18G might be precisely revealing in that regard.
- Altitude is a factor when comparing 2 Growlers. An Growler at 250 feet will be perceptibly louder than one at 1,000 feet, for example.
- Horizontal distance from the flight track.
- Sound duration in time in seconds or minutes.
- SEL, measured in decibels, which is the single event noise metric, and typically is higher than the peak loudness.

Any of those elements, if changed, will affect DNL calculations. My only point here is to acknowledge the complexity of calculating DNLs. Reliance on DNLs requires a bit of faith or confidence and if there are any errors, they should be on the side of too much clarity, when soliciting public comments from the public. Especially if a DEIS proposes 10 proposals for consideration and public comment.

Compared to actual noise measurements, DNL likely is not as valid in the context of drawing contour lines for evaluating noise associated with any particular proposal or alternative. Noise contours drawn utilizing actual measurement of noise might well differ significantly with those included in or inferred from data in the DEIS.

In terms of measuring community annoyance, it likely would have predictability value in projecting community annoyance, especially the “highly annoyed.” In part, that is because there are a lot of studies regarding annoyance and the experience of having used DNL enhances public predictability. Most of the surveys, however, involve commercial aircraft, not military aircraft. Moreover, FCLP’s involving thousands of similar closed loop flights on a “racetrack” resembling flight pattern are a far different series of events than comparing an arrival or departure flight. They are the absolute worst flights and represent a serious danger to the health of Civilians living below FCLP operations. Further, commercial aircraft over the last 50 years have been designed to be and are much quieter, while military aircraft have never been noisier, louder or more intrusive.

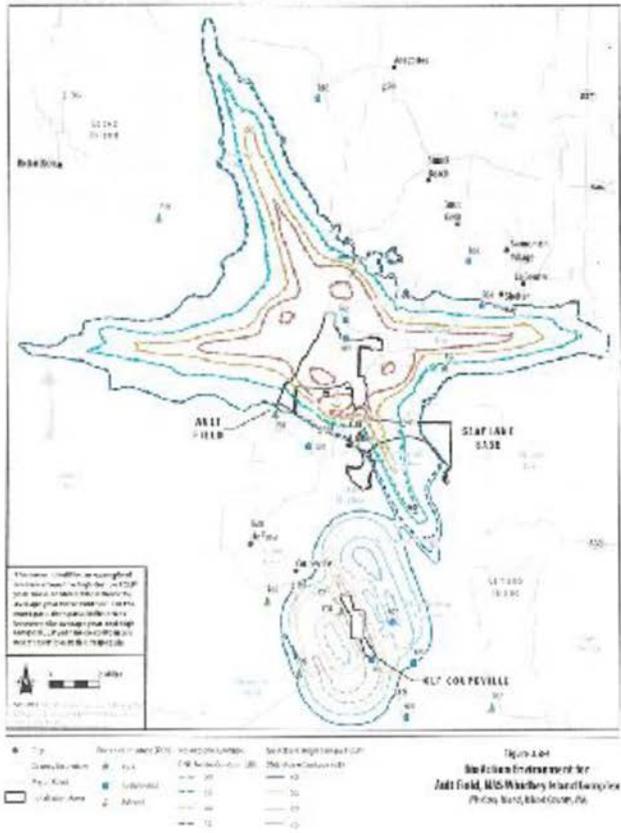
In the context of Coupeville and its environs, there are some real dangers in understating annoyance factors. That is because of the importance of a continuing stream of Tourists to the Coupeville economy, which economy has little reliance upon NAS Whidbey or the Navy. In view of the many instances in which studies have validated the use of 50 or 55 dB DNL thresholds to measure community annoyance, and because the Schultz study of 1978 has been updated and modified by Shultz himself, and because almost all federal agencies already have shifted to the 55 dB DNL threshold to predict community annoyance, it makes no sense and defies reality to continue to represent that the Schultz is the basis for adhering to the 65 dB DNL threshold for predicting the “highly annoyed.” As applied to Tourists, whose choices to come to Coupeville feed the Coupeville economy, it also seems unreasonable to conclude anything other than that Tourists who come to Coupeville and its environs to enjoy a day, weekend, or week or a month away from their busy lives elsewhere likely will be more noise-sensitive than any other group. Otherwise, you are on the side of risking serious or catastrophic financial crisis in that community which has virtually no interrelationship with NAS Whidbey or the Navy. The Navy’s continuing use of the OLFC for faster, louder aircraft already has soured Navy pilots and crews from living in or around Coupeville. Will the Navy now gladly participate in the souring or collapse of Coupeville’s economy?

It may well be the case, here and now, that an Alternative OLF location is the only responsible solution that can give serious consideration to the law, that is NEPA, and to the overwhelming opposition in Coupeville and its Environs to any of the nine Proposals embodied in Alternatives 1, 2, or 3.



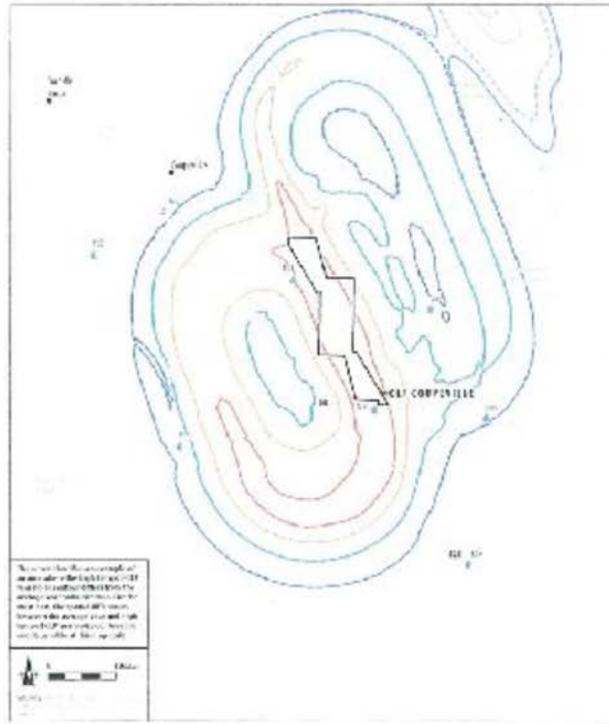


Figure 3.2-4 No Action Environment for Asilt Field, NAS Whidbey Island Complex



20

Figure 3.2.5 No Action Environment for OLF Coupeville, NAS Whidbey Island Complex

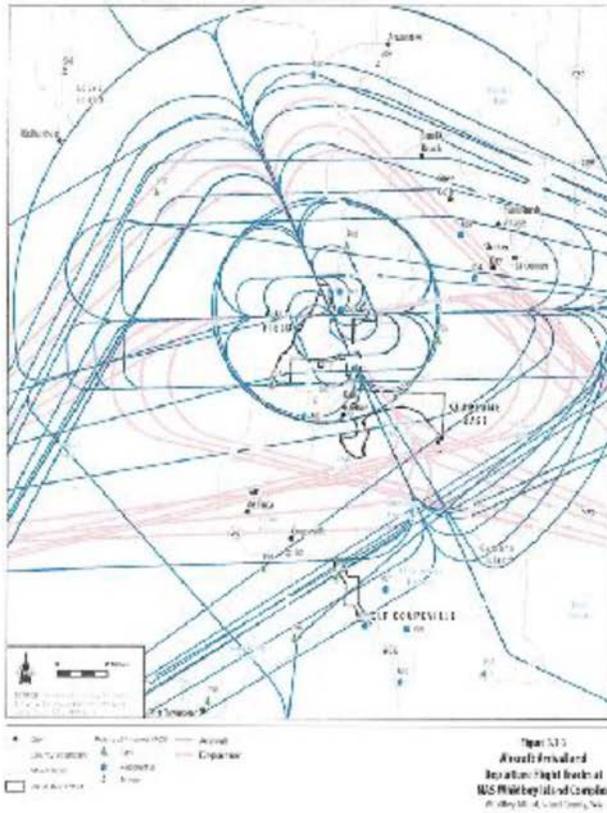


• OLF	○ Coupeville	○ Coupeville	○ Coupeville	○ Coupeville
○ Coupeville				
○ Coupeville				
○ Coupeville				

Figure 3.2.5
No Action Environment for
OLF Coupeville, NAS Whidbey Island Complex
Volume 1, December 2016

8

Figure 3.1-3 Aircraft Arrival and Departure Flight Tracks at NAS Whidbey Island Complex



8

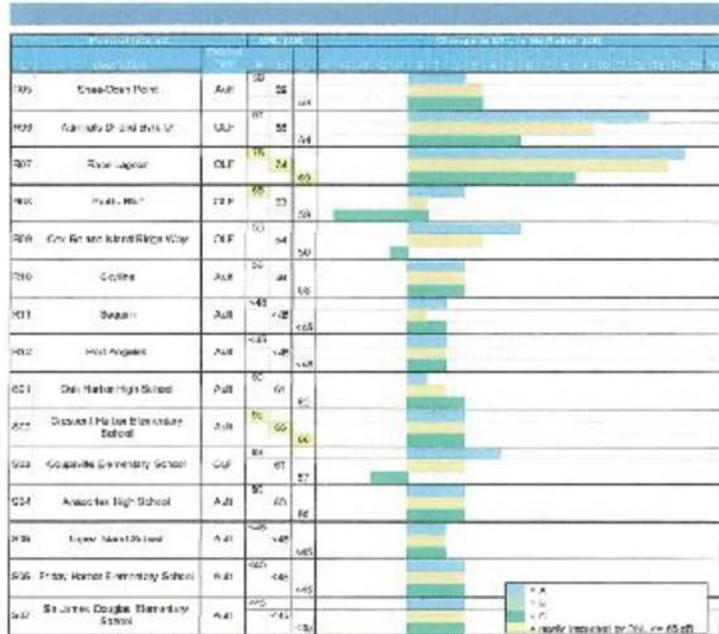


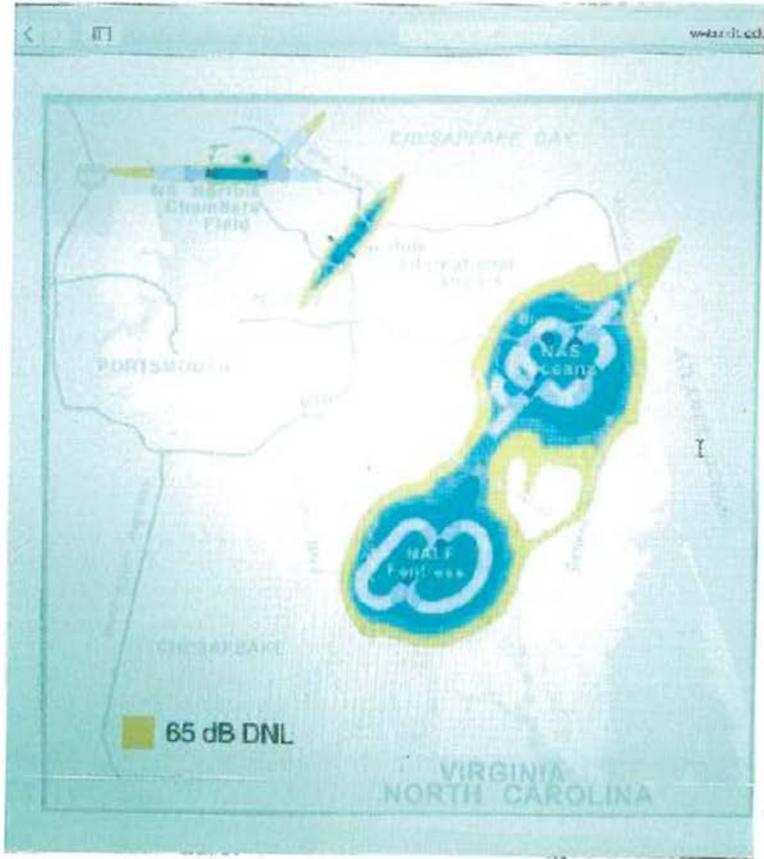
Figure 6-8. Estimated Aircraft DNL of POI for the Average Year Alternative 1 (continued)

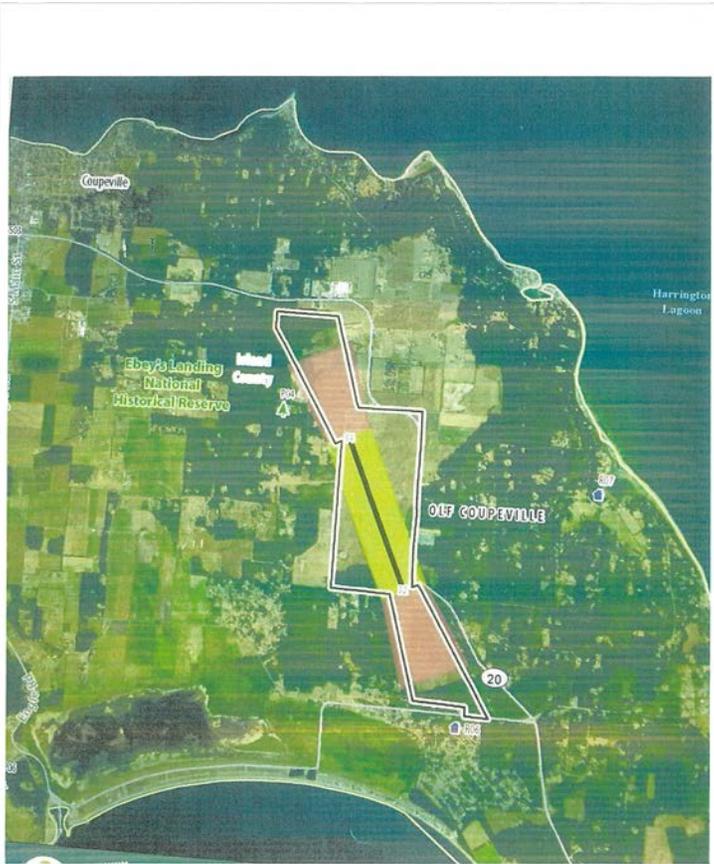
Under the High Tempo Year Alternatives 1A/B/C (Appendix G), 8-10 POI would experience DNL greater than or equal to 65 dB and 5-4 residential POI would experience DNL greater than or equal to 75 dB. Two of the latter category would be near Air Field (R01 and R02) and two would be near the OLF (R05 and R07). One of the 7 schools, PO1 R02, would experience DNL of at least 55 dB, i.e., 66 dB for Alternatives 1A, 1B, and 1C.

Under the High Tempo Year Alternatives 1A/B/C, increase in DNL would be greatest for 1A and smallest for 1C. Increases in DNL would range from 1 to 18 dB, relative to the High Tempo No Action Alternative. POI R07 and R05 would experience increases in DNL of up to 15 and 12 dB, respectively. POI R07 would be newly impacted for Alternatives 1A, 1B, and 1C with DNL of 70-76 dB. POI R06 and R08 would also be newly impacted, but only for Alternative 1A, with DNLs of 65 dB.

6.4.2 Potential Hearing Loss

Tables 6-8a through 6-8c show estimates of the population within 1-dB bands of Leq and their associated NIFTS for the Average Year Alternative 1. The Average and 10th Percentile NIFTS categories, up to 163 and 1,594 people would have the potential for NIFTS greater than or equal to 5 dB, respectively. Up to 76% of the Average NIFTS population would be associated with the OLF, and 46% of the 10th Percentile NIFTS population would be associated with the OLF, both for Alternative 1A.





SECTION 3.

COUPEVILLE & ENVIRONS: A QUALITY OF LIFE AT RISK OF DEVASTATION BY THE UNITED STATES NAVY?

The purpose of this Section is twofold: First, to acknowledge that the Town of Coupeville and its Environs, the vicinity surrounding OLFC, is idyllic and unique and vastly different from Oak Harbor. It is not my contention that it is better or worse than Oak Harbor, but that it is different. Coupeville's economy is built upon a structure or basis totally different from the economy of Oak Harbor. Coupeville's economy is not dependent upon jobs or employment at NAS Whidbey, in clear contrast to Oak Harbor. However, it is my contention that Navy action, proposed in the DEIS, likely would devastate the level of Tourism that is essential to the economic health of Coupeville, and that any of the nine Proposals set forth in either of Scenarios A, B, or C of any of Alternatives 1, 2, or 3 the DEIS, would have a Very Significant Impact on Coupeville and its Environs.

Second, a further purpose in this Section of My Comments is to observe the differences that have prevailed since the 1950's and that combine to make Coupeville a uniquely special place with characteristics that must be protected and cherished, not devastated or destroyed by Navy intransigence with finding a permanent solution to the conflict with OLFC (See Section 6. Alternatives to OLFC. Lastly, this Comment will observe the differences that have prevailed and existed in Coupeville since the 1850's, and should be permitted to continue to exist and not be devastated or destroyed.

In showing that Coupeville has been around a long, long time, it is often said, accurately that Coupeville is the second oldest city in Washington. The following is an excerpt from an article entitled "Front Street, Coupeville, Washington (www.chwahistoric.coupeville.com) that reads in part as follows:

"In 1848 Whidbey Island's first white settler, Thomas Glasgow, filed a land claim on what is now Ebey's Prairie. . . . Following the Point Elliott Treaty in 1855, many of the Lower Skagit people were placed on the Tulalip reservation. A few continued to live in Coupeville."

"The same Whidbey Island locations that appealed to the Skagits [tribes] also appealed to early white sea captains and farmers who explored and settled central Whidbey Island in the early 1850s. Ebey's Landing, on the Strait of Juan de Fuca, was an easy place to reach by water and the nearby prairie and protected harbor of Penn Cove made excellent sites for establishing homes and farms."

"On September 27, 1850, Congress passed the Oregon Donation Land Claim Act, granting free land (320 acres to single men and 640 acres to married couples) to anyone who had settled on the land before December 1 of that year. Colonel Isaac Neff Ebey (1818-1857) was the first man in Central Whidbey Island to file a claim (640 acres) on October 15, 1850. During the years of the Donation Land Claim Act, updated in 1853 and again in 1854, 29 settlers registered claims on the Prairie and Penn Cove."

"A small settlement called Coveland formed at the head of Penn's Cove and served as the first Island County seat (1853-1881). Captain Benjamin Barstow (d. 1854) opened the first trading post at this location in 1853. A group of land developers platted Coveland in 1888 and changed the name to San de Fuca, chosen because of its proximity to the Straits of Juan de Fuca. From 1881 to the present time, Coupeville has been the Island County seat" [Emphasis added].

Thus, History shows that Coupeville was established as a result of the migration of settlers to the area of Central Whidbey Island, among other places, as a direct result of the 1850 federal Oregon Donation Land Claim Act. While many the characteristics that once defined many of those other places created pursuant to that federal program to encourage migration, and that were cherished by residents of those other areas, even including Oak Harbor, have changed over time, but that is not the case with Coupeville. In terms of its ambiance, its citizenry, its business establishments, indeed its Comprehensive Plan, Coupeville cherishes its past and believes that its past is its present and its future, in terms of its economy. Coupeville seeks visitors and tourists on a year-round basis. Perhaps its Chamber of Commerce could tell you, if you ask, what is the rate of Tourists who arrive in Coupeville as return-Tourists. My guess is that rate might surprise the Navy. My point simply is to say that Tourism and the ambiance of Coupeville, along with its preference for locally-owned and operated tourist-service businesses like B&B's, restaurants, retail shops, souvenir shops, art galleries and artists, combine to make Coupeville, in today's world and even on Whidbey Island, truly special and unique to thousands of people who visit as tourists or who choose the lifestyle that comes with living and working there. I believe the economic vitality of Coupeville cannot and will not be sustained if Growler noise prevails and is increased, as proposed in the DEIS, and that would be a large step backward, not forward, and ensnaring Coupeville is the vice of noise with virtually no consideration given in the DEIS to the requirements mandated by NEPA for the preservation of cultures and lifestyles fostered by communities like Coupeville.

Nearly 90 years after Coupeville was established, and 61 years after Coupeville became the County Seat of Island County, NAS Whidbey was commissioned on September 21, 1942, near Oak Harbor. Not Coupeville.

It is useful, for these purposes, to gain a solidly-based understanding of Coupeville and its Environs. In that regard, a feature article was published on page M4 of the Sunday, November 4, 2007, Sacramento Bee, entitled "It just doesn't get much more pleasant than in Coupeville." I have used a 9-year old article to reflect that the views of Coupeville in yesteryears exist today. The article is an attempt by the author to provide the reader with a taste or described feeling for what it is about Coupeville that is unique and desirable, both as a place to live but also as a place to visit for a day, a week, a month, or whatever. I think the author succeeded and I have quoted some of that flavor and feeling:

"Coupeville, Wash. — "So here's what I've decided about this central Whidbey Island town and the forests, beaches and prairies that New England sea captain Thomas Coupe described to his wife as an 1850s "Garden of Eden.""

"Located mid-island between Langley and Oak Harbor, Coupeville still feels more like the pioneer town it was in the 19th century when Coupe laid claim to land on the shores of Penn Cove and turned Coupeville into a major Northwest port for the farming and maritime trades."

Quoting the owner of Elkhorn Antiques and a Coupeville resident for 35 years, the article says ""It's the last place on the island that moves at a slow pace." So get an early start"

"If you're coming from Seattle, figure on about two hours of driving and ferry-riding between you and the smell of salt air:"

"8:30 a.m.: Take the Clinton-Mukilteo Washington State Ferry for a 20-minute crossing across Possession Sound to Whidbey Island."

"Follow the . . . highway toward Coupeville (28) miles past the roadside stands selling fresh dahlias and basil. Notice how the forests give way to open land. These are the Whidbey Island prairies, large and fertile farm areas formed on the sites of ancient lakebeds."

"Chances are it will be dry in Coupeville even if it's raining the Seattle or Langley. Whidbey Island is about 50 miles long. The northern half lies within the Olympic rain shadow, and rain averages just 18 inches annually compared with 30 inches in the southern half."

"9:30 a.m.: Breakfast at the Coupeville Coffeehouse in the yellow building with the red trim at 12 N.W. Front St., overlooking Penn Cove harbor. . . ."

"A wild blue heron nicknamed Henry makes an appearance most mornings and afternoons on a sandbar near the red warehouse at the end of the wharf. Find a seat on the deck or inside . . . under a sign that says "Loitering is Encouraged.""

"10:30 a.m.: Walk the waterfront. Coupeville is part of a 25-square-mile area called Ebey's Landing National Historical Reserve, a 17,400-acre national park area that includes federal land, two state parks, private farmland, and a collection of historical buildings and Victorian-style homes in and around the old waterfront."

"Stop by the Island County Historical Museum . . . for a brochure for a self-guided walk around town and a 43 ½-mile driving and bicycling tour of the reserve."

"Start at the Coupeville Wharf and Warehouse at the foot of Northwest Alexander. Steam-boat service connected Coupeville with Seattle and Everett until a bridge built in 1937 at Deception Pass linked the north end of Whidbey to Fidalgo Island and Anacortes."

On display are the preserved bones of Rosie, a 33-foot gray whale that washed ashore in 1998."

"The walking tour includes 64 landmarks . . . so pick and choose and leave time to browse. . . ."

"Noon.: Tea time. The houses of former sea captains and merchants are scattered throughout the town. Anna's Tea Room, 606 Main St., feels more like an eccentric East Coast auntie than a sophisticated English tearoom and that fits Coupeville's small-town image just fine."

"Order a pot (\$3 for a small, \$5 for a large) and pick your own cup and saucer from a cabinet filled with a collection of mis-matched china. Settle into the sofa by the window or a corner table and plan your afternoon over lunch or warm scones. . . ."

"1 p.m.: Explore the Reserve. Named for Isaac Neff Ebey, one of the island's early permanent settlers, Ebey's Landing National Historic Reserve . . . includes eight miles of beach with a bluff trail looking out over the Strait of Juan de Fuca; paths through the prairies; a historic lighthouse at Fort Casey, a former military base, now a state park; forest land and lots of places for bird-watching and observing wildlife."

"Start at the beach. . . . There's a choice of two hikes: a 3 ½-mile loop trail along a bluff that skirts the strait. The other is a shorter walk inland through the prairie to a pioneer graveyard called the Sunnyside Cemetery."

"Kids will enjoy a visit to the Admiralty Head Lighthouse at nearby Fort Casey. Built with walls 18 inches thick to withstand earthquakes, it's open to the public for free. . . ."

"3 p.m.: . . . Lavender Wind Farm three miles from the Coupeville Waterfront. Names for the winds that blow off the strait in winter, the farm includes 2 ½ acres of organically grown lavender." Come pick your own, buy a plant, or walk the outdoor labyrinth. . . . Bunches of dried lavender hang from the ceiling of a small shop stocked with vanilla-lavender ice cream bars, jellies, teas, pillows and sachets."

"5 p.m.: Sample the seafood. Connoisseurs consider Penn Cove mussels to be some of the world's finest. In Coupeville, they're farm-raised by Penn Cove Shellfish LLC. All the restaurants serve them, along with local crab, oysters, and clams. . . ."

"If you're over 21 and up for some fun, try Toby's Tavern, 8 N.W. Front, a local hangout in an 1890's former beer parlor. . . ."

A statement I noticed in tourismmatters.com, regarding Whidbey and Camano Islands' Tourism, is that "Tourism is a major industry for Whidbey and Camano Islands, supporting approximately 1,600 existing companies and stimulating new business development and investment through

direct trip expenditures and real estate sales; and furthering opportunities to enjoy “peaceful landscapes and opportunities for biking, hiking, kayaking, sailing, or just breathing in the fresh sea air and relaxing in locally owned and operated restaurants and Inns are some of the enjoyable things about the Islands.

Similarly, a wide variety of interests, said to be met in exploring the Island County Historical Society Museum, Admiralty Lighthouse, Meerkerk Gardens, antique shops, art galleries, heritage farms working studios, farmers markets, wineries, and the Coupeville Arts Center with year-round fine art classes, are but a few of the choices. The Town of Coupeville Comprehensive Plan, adopted in 1994 and revised numerous times through 2003, touts the things that foster the Coupevillian lifestyle. It also indicates an intention to guide the future growth, character and development of Coupeville for the next ten to twenty years. The plan declares numerous goals, including “to promote a development pattern that recognizes and enhances its historic small-town character; to provide a self-balanced mix of land uses, including recreational and cultural opportunities, to preserve the town’s rural and agricultural heritage. There is no mention in Coupeville’s Comprehensive plan regarding OLFC and FCLP operations, or the Navy. I’m quite certain that is not intended as an insult to the Navy, but rather is support for the notion that Coupeville values its small town nature, quaint size and architecture, and slow pace of life. I once asked a City Councilman why Coupeville had a city wide speed limit of 25 mph on every street and road in Coupeville, but Highway 20, which is controlled by the State of Washington. He told me that he would change Highway 20’s speed limit within the Coupeville City Limits, to 25 mph, if only he had the authority (I was against the city-wide speed limit. Still am. But I understand and accept it). I mentioned the absence of chain restaurants to my real estate agent (married to the City Councilman referenced above) who hails from one of the pioneer families that settled Ebey’s Landing, when I was negotiating the purchase of the lot upon which my home now sits, and she boldly told me that if I wanted to eat grease I should go to Oak Harbor. I think that was an insult intended only for me. Coupeville, simply stated, is far different from Oak Harbor, much less the Navy. In the intervening years since then, I have learned that Coupeville is a special place if you accept the things for which it stands. And many Tourists, visitors, and Coupeville residents are living proof.

In an issue of the USA Today newspaper, an article written about Coupeville by Nicole Crawford, and noticed by me at www.usatoday.com, states that Coupeville, the second oldest town in Washington, still provides a taste of waterfront farm life. In regard to “Outdoor Ventures” she writes that Colonel Isaac Neff Ebey was one of Whidbey Island’s first settlers, and the scenic Ebey’s Landing is named after him. She describes the Coastal bluffs of Ebey’s Landing as towering as high as 270 feet, making them the tallest bluffs in the State of Washington. For a moderately easy hike she advises starting at the Prairie Overlook and continuing for half a mile to the visitor’s center, which is located in a 1850s homestead. Finally, she says, if you are up for a challenge, to continue on the trail and climb the bluffs to gain access to views of the Olympic Mountains, Vancouver Island, Strait of Juan de Fuca and San Juan Islands.”

I have done all of that many dozens of times over the years. It is a 2 to 2 ½ hour easy hike that exposes the hiker (including out-of-town friends), in a compact but comprehensive way to the wonders of the area that is and surrounds Coupeville. It is a place where visitors can come, visit, and escape the noise and business of their everyday lives, elsewhere, and capture the feeling of living in harmony with nature and the environment, appreciating both the wondrous visuals of mountains, boats, eagles. . .

These aspects of life on Whidbey and around Coupeville in particular bespeak a long-standing culture and way of life far different from city life, military life, or even life in Oak Harbor. Twice in

the 14 years I have resided full-time on Whidbey Island, the City of Oak Harbor has expended \$40,000 for outsiders to perform a study of how best Oak Harbor could use its waterfront to attract Tourists or businesses. After however many years Oak Harbor has been an incorporated municipality, they apparently still are searching for a new identity. I say that only to draw a sharp and distinct difference between Oak Harbor and Coupeville. Oak Harbor is seeking the change that will make Oak Harbor more attractive as a place to do business or attract Tourists. Coupeville knows, understands and is willing to fight to preserve the heritage and life style that has existed for well over 150 years. The Navy comes along and now is seemingly fighting to destroy the character, charm, quaintness that is Coupeville and its Environs, with ever increasing levels of noise and noisy flying days at OLFC.

It is apparent that the place we call Coupeville and its Environs should not be burdened with any FCLP operation conducted at OLFC because the way of life there and the impact of FCLP operations is clearly in conflict with that way of life. Yet, that is what the Navy has been doing and is proposing to do up to 575 percent more. It is one thing for the Navy to expand NAS Whidbey. It is quite another to do what the Navy is proposing to do to Coupeville and its Environs. The Navy's DEIS would enlarge the sound contours reflecting Growler FCLP operations to encompass all of Coupeville for the first time ever. It would also increase from 6,100 FCLP operations conducted per year at OLFC to as many as 35,100, which represents a 575 percent increase. That would be unconscionable and intolerable and absolutely in conflict with the oft expressed lifestyle and Tourist-based economy of the quaint village that is Coupeville. The Navy's DEIS shows that the increase in acreage subjected to such an increase would impose a sound level of between 65 and more than 75 dB DNL of at least an additional 4,144 acres, a 50% increase (See Table E-1), as well as another 500-1,000 acres impacted by a contour range of 55-65 dB DNL. No reasonable person could persuasively argue that the Tourists who are drawn to Coupeville's ambiance, solace, and beauty would continue to be drawn to listen to the debilitating noise that is the noise from Growlers performing FCLP operations or that small acreage agricultural endeavors could be sustained. Tourists would flee from Coupeville in a New York second. Further, once Coupeville's economy is devastated, how will the Navy or anyone else bring it back. For the residents who now reside in or around Coupeville, the end might be near, and the Navy cannot even present publicly an even-handed, objective DEIS that mentions Coupeville's economy.

Notwithstanding the mandates upon the Navy that are included in NEPA, to respect the interests of citizens in areas affected by its plans and proposals (See Section 1, My Comments), the DEIS does not address the impacts of any of its 10 proposals contained in the DEIS upon Tourism. While it does discuss in its own terms, the "Economy, Employment and Income [and Affected] Environment" of "NAS Whidbey Island Complex" and "Island and Skagit Counties", it ignores Tourism, notwithstanding its impact on Coupeville (See Secs. 3.10.2.2; Sec. 5.4.10.3).

Even Navy literature is confounding. Included in the documents available on the Internet, there is a document welcoming newly assigned personnel with this: "Whidbey Island is about 35 miles long [actually it is far longer than that] and is ranked as the fourth-longest and fourth-largest island in the contiguous United States. Here you will find abundant recreation possibilities, from boating, hiking and biking to hunting and fishing (www.mybaseguide.com/navy/13-719/nas_whidbey_island-arrival) (2016). Then it shows its Navy side, in reciting the Navy's History on Whidbey island, with this: "NAS Whidbey Island was home to the majority [but not all] of the Navy's Prowler squadrons, and now [is] the only base for all the new EA-18G Growler squadrons [Emphasis added]. It supports 14 Prowler/Growler squadrons, 10 of which deploy to aircraft carriers, three expeditionary squadron not assigned to carrier air wings and one Whidbey-based training

squadron" (www.cnmc.navy.mil). Those Growler numbers don't include the Growlers proposed to be added to NAS Whidbey's inventory pursuant to Alternative 1, 2, or 3 per the DEIS.

Economically, the scenario I have attempted to paint in this section, if implemented, would be catastrophic to Coupeville and its Environs. Tourists would be the first to disappear. Then some of restaurants, followed by small businesses would fail. Home prices in Central Whidbey, which have never recovered anywhere close to 2006-2007 levels, would decrease even further with previously unknown levels of Navy growth at NAS Whidbey. And of course, up to 35,100 FCLP operations at OLFC.

Is this what the Navy means when it says it wants to be a good neighbor? All of this, without mentioning or considering a worthy re-location of FCLP operations to an OLF designed specifically for FCLP operations, and where there are no people living in towns nearby like Coupeville, or nearby so as to be beneath FCLP flight tracks.

Coupeville and its surrounding neighborhoods is a place that absolutely should not be burdened involuntarily, or impacted adversely, by a long-term, permanent expansion of the Navy's Whidbey island presence involving OLFC, reflected in any or all of the four proposed alternatives in the DEIS. The four proposals, in essence, would entail a unilateral exercise of power by the Navy to impose upon Coupeville and its Environs, the horrifically repetitive, incessant, and dangerous intensity of Growler noise which obviously would accompany such choice. Further, the DEIS inaccurately and deliberately mischaracterizes the intensity of that noise, which is the primary basis of civilian complaints, by choosing a computer program to model computer-projected noise characteristics and that disregards the actual decibel levels of noise, or the full annual dosage of noise that is in excess of OSHA limitations and requirements. While the Navy obviously has sufficient power to cram or jam any of the four proposals into the part of the unique, idyllic world of Coupeville and its Environs, stated very simply, that would be the wrong choice.

As an alternative, there are areas in the Pacific Northwest where a new FCLP Landing strip, station, or NAS could be constructed where there are no civilians whose lives would be adversely impacted by Growler flight tracks involved in performing FCLP operations. A new OLF also would resolve the issues that presently exist regarding the present use of OLFC. There is no doubt that if the Navy ignores these issues, it very likely will heighten the existing adverse impact upon the civilians who are the people who live in Coupeville and its Environs, by weakening or destroying the economic benefits from the Tourists and other visitors who come to Coupeville to enjoy a week, a weekend, or a day throughout the year. The Tourists and other visitors who come to Coupeville and Central Whidbey to enjoy a week, weekend or day away from the hustle and bustle of their lives wherever, would be greeted by noise beyond the levels presently existing. It is unrealistic to say that Growler noise, increased by up to 575 percent by proposals in the DEIS, would not matter.

The Tourists and visitors to Central Whidbey would be the first to flee to some other idyllic location. That could effectively damage the economy of Coupeville, whose merchants, inn-keepers, and B&B proprietors would suffer, along with restaurant owners, virtually all of which are locally owned and operated. That would create a public relations nightmare for the Navy. Tourists and visitors who come to Coupeville for a week, weekend, or day would avoid the noise because the ambiance and attraction that is Coupeville, as described in the article quoted above, could not co-exist with the Growler noise that already has generated enormous amounts of complaints and even lawsuits from activists. If the Navy chooses to make the situation worse than what reasonably could be expected, other than that the complaints and lawsuits would/

could increase exponentially and become a serious public relations nightmare for the Navy. That should not be read as a threat, but rather as an educated guess that making a choice that will exacerbate the presently existing bad situation for the residents in Central Whidbey Island, and that could impel many more citizens to join in fighting the Navy in the court of public relations and in the halls of the statehouse, the White House, and Congress.

These need not be resolved by an "either-or" solution, which the Navy seems determined to compel. Rather, it is clear that the presently existing Growler-noise based issues would be resolved by a new OLF, but so far the Navy won't even consider that as an alternative proposal, which seems to be a mandate in this instance, required by NEPA. NEPA does not require the devastation or destruction of Coupeville's chosen path of life, especially if there are reasonable alternatives, which there are as addressed in Section 6 of my comments.

The alternative of relocating OLF is simply a conclusion that follows from taking a close look at the present depth of the problem, Navy intransigence in recognizing and permanently resolving the problem, and preventing the Navy making a unilateral decision in this particular instance that would devastate not only the economy of Coupeville but investments and home values for many of us Central Whidbey Islanders. A new OLF for FCLP need not entail moving the permanent assignment of any EA-18G squadron from NAS Whidbey, but it could have the side effect of reducing or eliminating most or all of the FCLP operations performed at NAS Whidbey. Then, could not the Navy learn to co-exist with all of Whidbey Island? There would still remain an enormous amount of noise generated by high-speed, ascending and descending overflights, but those could be tolerated and endured, if not loved. Maybe even some Pilots and Crew Members of EA-18G would even move to Coupeville.

SECTION 4.

DEIS' ECONOMIC BENEFITS TO COUPEVILLE & ENVIRONS MEANS NEGATIVE IMPACT BURDENS

The purpose of this Section is to show that the Draft Environmental Impact Statement (DEIS) for continued or increased EA-18G "Growler" FCLP Operations at OLFC is a burden upon Coupeville and its Environs that will be increased bigly by the selection, approval, and implementation of any of the ten proposed alternatives set forth in the DEIS. It would be tantamount to a declaration of economic war by the Navy upon the citizens who live in the vicinity of OLFC or Coupeville.

Strong words? Let's see if I can persuade you that they are accurate. I believe they are.

The DEIS includes many many pages, figures, and charts, including two that I wish to draw to your attention. Figure 3.6-3, in Volume 1 of the DEIS, shows in geographic terms, with a gold-colored hue, the off-installation historical properties near Ault Field and OLFC, as distinguished from non-historical properties. That Figure also shows the "APE", which is an abbreviation used in the DEIS for "Area of Potential Effect." The APE is encircled by a thin sienna-colored line around OLFC, and indicates that the APE near OLFC encompasses about 40-45% of the historical properties near OLFC.

The Navy, in the DEIS, states that it uses three ranges of decibel levels, expressed as DNL's (an average that includes quiet hours of nighttime to calculate a 24-hour average), in showing and describing the impacts of the four Alternatives under consideration. The lowest range in the DEIS is the range between 65-70 dB DNL and the Navy bases that choice upon a 38-year old study by Schultz (See T. J. Schultz Synthesis of Social Surveys on Noise Annoyance, Jour. Acoust. Soc. Am., p. 377-405 (1978)) that was updated and modernized years ago bu Schultz himself as well as numerous others. The DEIS, in part, defends its use of that outdated study by stating that "research [namely the 1978 un-updated Schultz study] has indicated that about 87 percent of the population is not highly annoyed by outdoor sound levels below 65 dB DNL" and that "most people are exposed to sound levels of 50 to 55 or higher on a daily basis. In other words, the Navy contends that there is virtually no reason to include a lesser range because it would not apply to a significant percentage of the affected populations. That has been proven to be inaccurate by several researchers (See e.g., Sanford Fidell, The Schultz Curve 25 Years Later: A Research Perspective (2003); and H. Miedema and H. Vos, Exposure Response Relationships for Transportation Noise, Jour. Acoust. Soc. Am. p.3432-3445 (1998)). The 1978 Schultz study, in synthesizing data from several noise sources, assumed incorrectly that the relationship between people who were "highly annoyed" at the 60 dB DNL level remained the same regardless of noise source. Indeed, the 13% determined by the 1978 Schultz study to be "highly annoyed" was based on three distinctly different noise sources that were mistakenly synthesized for the study on the basis that source didn't matter. The sources in question were aircraft noise, road noise, and railroad noise. Twenty years later, the Miedema & Vos study (Id., at p.1998), among others, determined that there are widely differing levels of annoyance within each of those three categories of noise source: aircraft noise, road noise, and railroad noise, and provided a chart based upon updated data that verifies that point for 5 different DNL levels of aircraft noise:

DNL	Percent Highly Annoyed			Schultz <i>Combined</i>
	Miedema & Vos		<i>Rail</i>	
	<i>Air</i>	<i>Road</i>		
55	12	7	4	3
60	19	12	7	6
65	28	18	11	12
70	37	29	16	22
75	46	40	22	36

Thus, if the Navy wanted to use a threshold of 12% highly-annoyed persons, as being a sufficiently large group of citizens to draw additional contours, then the Navy should have drawn or re-drawn contours both for the 55-60 dB DNL range (12%) and the range 60-65 dB DNL(19%). Together, those two additional contours represent 31% of the highly-annoyed population subjected to the DNL's between ranges for 55-65 dB DNL and are worthy of consideration instead of relegating their views to the bin of those whose views are worthy only of being ignored and disregarded. I implore the Navy to do so before making its decision. Otherwise, it would appear that the Navy did not mean what it says in the DEIS about the 12% of the population argument referenced above; and would be ignoring fully 31% of the population highly annoyed with Growler noise within those 55-65 dB DNLs. Further, keep in mind that, consistent with the Schultz update, there are numerous studies indicating that the rate of annoyance for aircraft noise annoyance clearly is higher (i.e., a lower dB threshold) than for commercial aircraft, road noise or railroad noise. Continuing to use the 1978 Schultz study is nothing more than using the lower thresholds for persons who are highly-annoyed by railroad and traffic noise in order to minimize the threshold for persons highly-annoyed by aircraft noise.

In drawing the contour lines for the “No Action Proposal” (i.e., a continuation at OLFC of 6,100 FCLP operations per year), the Navy inexplicably doesn’t use just the three ranges indicated above. Without explanation, the DEIS contains a fourth line, namely, a 60 dB DNL line (See, e.g., Figure 3.2-5). Then, in showing the effects, by contour line drawings, of the Proposal known as Alternative 1, Scenario A, the contour lines representative of the status quo of 6,100 FCLP operations at OLFC per year reflect that the contour lines showing the “No Action Proposal” has wider, greater effect at 60 dB DNL than the Alternative 1, Scenario A , proposal viewed from its 65 dB DNL contour line (Figure 4.2-5). * Maybe there is a reason. The only one I am able to see is to obfuscate and confound the real impact to support a finding that selecting Alternative 1, Scenario A, could be said in reliance on the figures above to be of “No Significant Impact.”

*It also shows that contour lines, which express a 24-hour average dB DNL level for the “No Action Proposal”, are unaffected by high temp FCLPs that of necessity would mean a higher intensity within FCLP operations within the same period of time less than 24-hours, or a higher number of FCLPs on a day, which would increase the noise average for that day. If that calculation was made. I’m not sure it was made.

But, on second thought, maybe there is one other impact. The Navy’s preference for discussing no DNL range below 65 dB DNL is belied by its use of a contour line based on the 60 dB DNL as reflected in several Figures in the DEIS, including Figure 3.2-5, that would change the APE numbers which are used in several instances to establish an easily understood visual aid to understand the impact of the effects of any of the four proposals on such instances. Similarly, redrawing the contours relative to OLFC activities would enlarge the contours if the contours are redrawn to include “lobes” as presently done for Ault Field flights (see my discussion in Section

entitled "DNL and It's Value). At this point, I invite you to look at each of Figure 3.5-3 Parks and Recreation Areas in the NAS Whidbey Island Complex Affected DNL Noise Contours; Figure 3.6-1 Location of Historic Properties; and Figure 3.6-3 Location of Off-Installation Historic Properties. Starting with Figure 3.6-3, I only wish to discuss the circle around OLFC that is a sienna color and that overlaps the Historic Properties near or in Coupeville. The sienna-colored line represents the APE, the area of potential effect of the DEIS. Rather than tackle the discussion in the DEIS, I want you instead to refer to Figure 4.2-5 which shows contour lines of 60 dB DNL, both for the No Action Proposal, for the Alternative 1, Scenario A, proposal, and for the Alternative 1, Scenario A, proposal for high tempo FCLPs. Now, for each of those lines, compare the location of the Historic Properties close to Coupeville, and notice that each of those contours would place more of those properties within the noise contours. Finally, visualize in the top left corner of Figure 4.2-5 where a 55 dB DNL contour line would/should be drawn around Coupeville. A 55 dB DNL contour line within which 12% of the Population would be "Highly Annoyed by Growler noise is significant, right?"

If you will perform the same exercise for Figures 3.6-1 and 3.5-3, you will see that a 55 dB DNL would become more burdensome for the Navy to support a finding of "No Significant Impact." In my opinion, while figure 3.5-3 shows no APE contour, you can understand the impact that a 55 dB DNL contour line might have on a person wishing to enjoy the outdoors, including Tourists, visitors, and residents of Central Whidbey.

Somehow, to my way of thinking, that place we call Coupeville, should not be burdened with any FCLP operation conducted at OLFC, certainly not a burden that is increased by any measure. Yet, that is what the Navy is proposing. It is one thing for the Navy to expand NAS Whidbey. It is quite another to do what the Navy is proposing to do to Coupeville. According to the Noise Contours drawn for Alternative 1, Scenario A, the contours (similar to Scenario A for Alternatives 2 and 3), would be enlarged so that they would encompass all of Coupeville for the first time ever. It would also increase from 6,100 FCLP operation conducted per year at OLFC to as many as 35,100, which represents a 575 percent increase. That would be unconscionable and intolerable. By the Navy's DEIS, the increase in acreage subjected to such an increase would impose a sound level of between 65 and more than 75 dB DNL of at least an additional 4,144 acres, a 50% increase (See Table E-1), as well as another 500-1,000 acres impacted by a range of 55-65 dB DNL. No reasonable person could persuasively argue that the Tourists who are drawn to its ambiance, solace, and beauty that is Coupeville and its Environs would continue to be drawn to listen to the debilitating noise that is the noise from Growlers performing FCLP operations. They would flee from Coupeville in a New York second. Further, once Coupeville economy is devastated, how will the Navy or anyone else bring it back. For the residents who now reside in or around Coupeville, the end might be near, and the Navy cannot even present publicly an even-handed, objective DEIS that discusses the impact of 35,100 FCLP's executed at FCLP upon the Tourist industry needed by Coupeville for its way of life, its character, and laid-back attraction to thousands of Tourists.

Figure 3.6-3 Location of Off-Installation Historic Properties

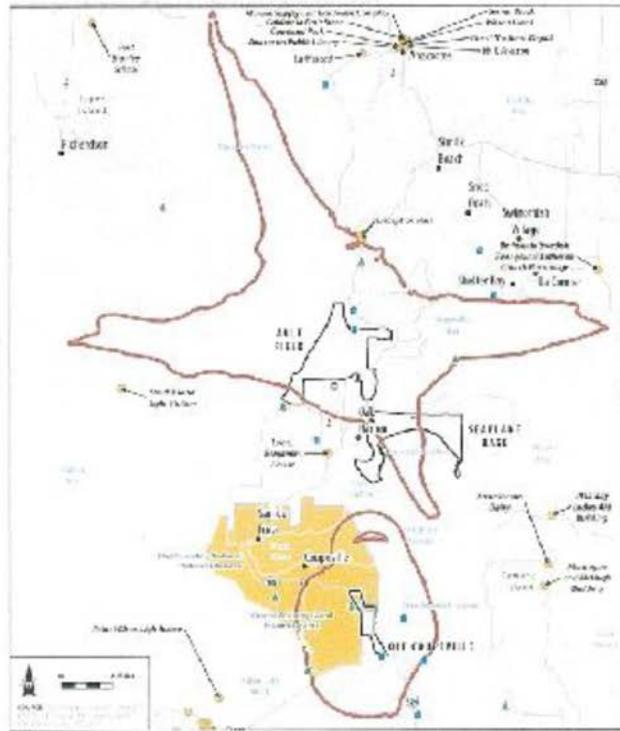
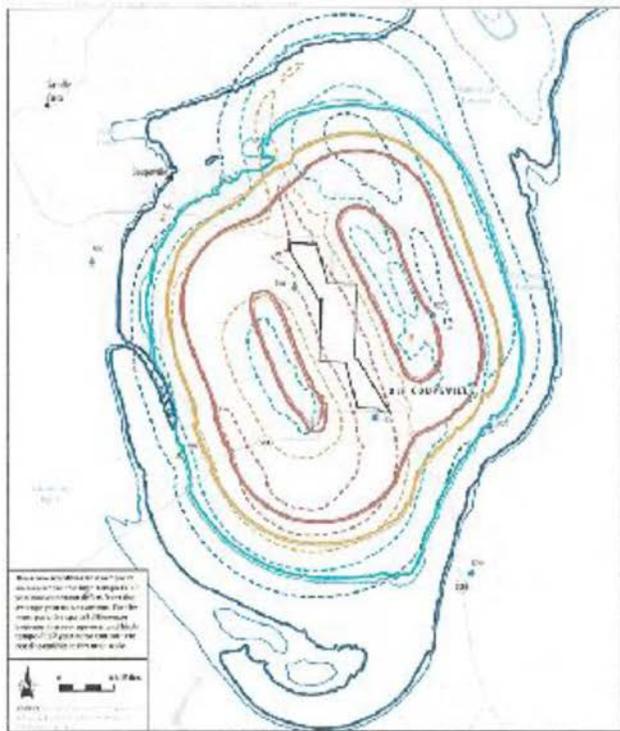


Figure 3.6-3
Location of Off-Installation
Historic Properties
Whidbey Island Land Camp, WA

Figure 3.5-3 Parks and Recreation Areas in the NAS Whidbey Island Complex Affected Environment, ONL Noise Contours

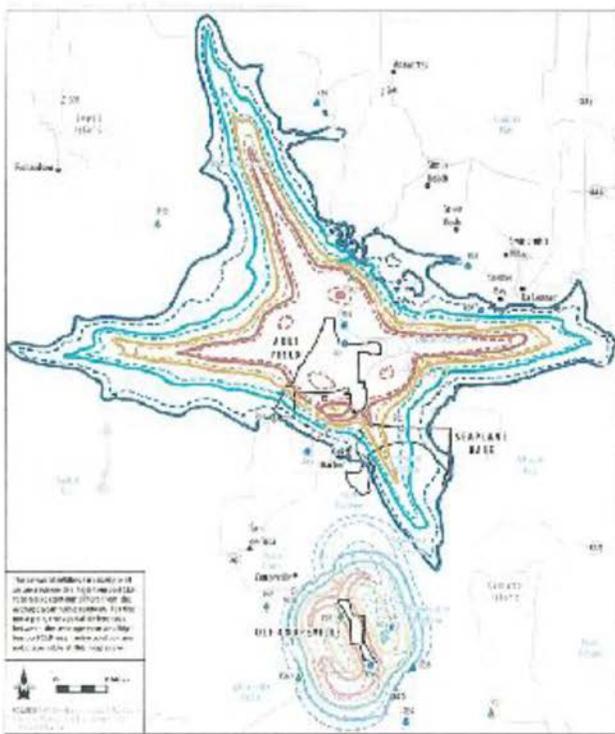


Figure 4.2.5 Alternative 1A DNL Noise Contours for OLF Coupeville



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Figure 4.2-4 Alternative 1C DNL Noise Contours for Ault Field



• 1C: Alternative 1C
 • 1B: Alternative 1B
 • 1A: Alternative 1A
 • 1D: Alternative 1D
 • 1E: Alternative 1E
 • 1F: Alternative 1F
 • 1G: Alternative 1G
 • 1H: Alternative 1H
 • 1I: Alternative 1I
 • 1J: Alternative 1J
 • 1K: Alternative 1K
 • 1L: Alternative 1L
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SECTION 5.

ELECTRONIC WARFARE AGAINST ONE CIVILIAN?

Whose Actions Caused Persistent Destruction Over Time of Electronic Equipment in My Home? A Documentary Accounting.

Having grown-up in a small idyllic town in the picturesque mountains of Northern California, mostly after the conclusion of WWII and during the relative boom years of the Eisenhower Presidency, it was “normal” for a young man (me) who got his yearly fill of fishing, hunting, and playing football, basketball, and baseball, to put on my vision of an “Ivory Tower” people who had achieved status in society and in my personal world - such as school teachers, coaches, members of the military from my hometown, like Robert Keluche an Air Force Pilot in the 50’s, Freddie Smades a Navy Pilot who went to Norway in the 1950’s and came home with a striking blonde bride and became my hero, various respectable politicians, ministers of the teachings of the Bible, and numerous other types and categories of people. One by one, events committed by individuals in virtually all walks of life, lowered substantially the people on my Ivory Tower. Fast forward, if you will, to the early 2000’s to my home on Whidbey Island.

In Mid-2006 my long-term wife, [REDACTED], and I encountered events that drew into question, at least in our minds, the quality of the electricity being delivered to our home. We contacted PSE and, after describing in detail the facts causing our concerns, the PSE came to our house, performed a number of tests over the course of a couple of hours or so and indicated that the quality of the electrical service was perfectly normal. Nevertheless, they hooked-up monitoring equipment and tested the quality of the electricity for approximately two weeks. After that period of time, they examined the recorded data and indicated that the testing revealed nothing diabolical or abnormal.

Thereafter, my suspicions and concern remained and I contacted a licensed, commercially-rated Electrician, CK Electric, and described the problems I had encountered and the testing that had been done by PSE. And I asked about the installation of a “whole-house surge protector.” I opted to incur the expense of \$576.11 to have the surge protector installed in the Summer of 2010, which protects our entire home and its contents from surges in electrical power service from PSE. Sadly, that did not coincide with the termination of my problems. But I can say that, as the PSE indirectly predicted, that whole house surge protector has not been “tripped.” Not even once in six plus years.

I then began to discuss possible sources of my problems with other people. A couple of people suggested that the source of the problems I had encountered, over time, plausibly could be the United States Navy, with their vast and powerful array of electronic warfare equipment. By this time, we had realized that each of individual devices that had been destroyed beyond repair were devices that received or transmitted information delivered wirelessly, via Wi-Fi or radio signals within my home. Over time, subsequent episodes resulted in the further destruction of electronic equipment installed in my home, at random times.

Further, I had checked with the neighbors who live in my subdivision consisting of 24 lots of about one acre each. Not a single, other person or family, has incurred any such or similar losses.

Ultimately, [REDACTED] (the Diplomat) called NAS Whidbey and was passed-off to a couple of different people, apparently qualified to discuss our theory that personnel aboard a Prowler or Growler, or both, while flying overhead of our home, may have unilaterally declared Electronic War against us by utilizing their Electronic Warfare equipment, covertly or overtly, intentionally or unintentionally, to destroy electronic equipment in my home, having a combined value of more than ten thousand dollars.

While these episodes may sound preposterous and beyond the pale, no one can deny that the events occurred or that the expenses we endured, incurred, and paid over time (and for which we have every original receipt) are real. And no one in my neighborhood or elsewhere in sphere of my knowledge on Whidbey Island has suffered similar losses. And no one has offered a reasonable alternative conclusion. Who else on Whidbey Island has that capability and opportunity?

What is Electronic Warfare? Electronic Warfare utilizes electromagnetic energy, which is energy that is reflected or emitted from objects in the form of electrical and magnetic waves; and can have enormously powerful destructive effect. On the good side, Electromagnetic energy is utilized by computers, cell phones, microwaves, tv remote controls, weather stations, cell phone towers, radars, remote controls, wi-fi's, bluetooth, and other similar home devices for valid communications purposes. It also is utilized by militaries around the world to facilitate ground to air, air to air or ground, and other types of radio communication, radar, and radio and other controlled guidance systems (for weapons like ground to air missiles). Electronic Warfare utilizes electromagnetic energy in beams and bursts to destroy, control, or disable an enemy's ability to use its myriad electronic systems, which in turn facilitates relatively unimpeded access to electronic equipment by the U.S. military in conducting its military operations. In the Pacific Northwest, the Navy practices detecting, identifying, and locating the kinds and types of electronic signals that typically may be expected to be encountered when flying above hostile territory. Like my home?

One question that arises, naturally, is whether someone in the Navy did this to my [REDACTED] and I. My answer is whom else flies around our neighborhood at low or even moderately high altitudes, and at times unimpeded by supervision? Opportunity exists when Growlers are departing from or arriving at Ault Field for or from points beyond Whidbey Island, and just before entering the FCLP patterned flights or when exiting control by OLFC operations personnel and before making contact with Whidbey Approach. There is no one but the Navy, in my opinion, around Whidbey Island. They have the equipment, they have the opportunity, they have the time, but do they have the motive?

I have spent hours upon hours asking myself this question: What have I done in my past that would motivate someone to commit an act that could lead even to a dishonorable discharge at a minimum, or to criminal charges? In the 14 years I have lived on Whidbey Island, I have never met a single pilot, other than a couple of helicopter pilots whom I talked to in the presence of [REDACTED] on the day a friend and I, along with [REDACTED], flew an amphibious de Havilland Beaver, circa 1944, to the Seaplane Base, deployed the wheels at an appropriate time, and crawled up the concrete ramp to a standing ovation (there were no chairs!) at the celebration of the 75th Anniversary of something Navy, maybe Navy Aviation. No suspects there.

I can only come up with three potential and plausible answers.

First. On February 15, 2006, I had shoulder surgery performed in Seattle by Dr. Joel Shapiro to reconnect the rotator cuff on my left shoulder that had been ripped off the bone in a fall involving

a collapsed ladder. Prior to the surgery, I indicated to Dr. Shapiro that I had been a pitcher and that, while I had never received a call from a team in the Big League, I didn't want to tell them, if they called, that I could not go because of him. So, he drilled three holes through the appropriate bone, used titanium thread to tie the affected tendon to the bone, used a medical rasp to generate bleeding to foster scar tissue and the shoulder was far better than before. After a few weeks, the Doctor prescribed physical therapy, which was performed on Whidbey Island by a Prowler pilot's wife. While his wife and I had an immediate connection that permitted us to communicate easily and willingly with one another, neither of us ever made a "move" to explore or commence a romantic relationship. For one thing, there was an approximately 25-30 year difference in our respective ages. Clearly, my age was the highest number. For another, I have been married to the same woman, [REDACTED], for over 46 years and she is my best friend, and never have I betrayed her or our wedding vows. In point of fact, I had even broached the subject with the Therapist of her coming over for dinner, along with her Pilot husband and their kids. She didn't think the Pilot would be interested. That idea apparently was dead on arrival. That is the only relationship to which I can point to, and it does not seem much more than far-fetched.

While I have zero evidence that this particular Pilot or his Crews (over time), or friends of this particular Pilot who themselves are Pilots or Crew Members did anything, I remain nonetheless the victim of having had on numerous occasions losses that are difficult to explain, absent Navy involvement, which I acknowledge is a possibility as well. I will say, also, that during my very satisfying 6-year stint as a Regular Officer in the United States Air Force (my letter of resignation of my commission was accepted but delayed for one year because of Vietnam and the need for Officers with my AFSC (Air Force Specialty Code), according to President L. B. Johnson). I spent a full year on a remote assignment in Asia and dealt personally with the extraordinarily high number (nearly 30 percent, as I recall) of Enlisted Personnel under my direct supervision who had received Dear John letters from their spouses; and a higher percentage for personnel who received Dear John letters from girl friends. Military life exacts a high price far too often for both Officers and Enlisted Personnel because of temporary duty and permanent changes of duty in remote locations. And it is tough to be away from home and not know or understand changes that may be occurring. That, however, even if true, would not excuse what has happened to my wife [REDACTED] and I in regard to the damages we have sustained.

Second. The second potential source is that my home may have been a case of mistaken identity. I do know one of my neighbors has, at some point in the past, been an active member of an activist group opposing the utilization of the OLFC for any purpose (and I have only recently reached the same conclusions regarding OLFC). I instructed my wife, [REDACTED] (to the extent I am able to give her instructions) that, when she called NAS Whidbey, to discuss the history of our electronic equipment losses, and to also ask the Navy representative whether he knew or knew of our neighbor. He answered in the affirmative and offered his condolences. That may be humorous, but it confirms the possibility that someone, or more than one someones, may have thought they were bombarding my neighbor's home with Electronic Warfare energy, instead of mine. The Navy representative called back a day or so later, and while he would not confirm that he had discovered evidence implicating the Navy or Navy personnel, neither would he deny Navy or Navy personnel involvement. Consider this scenario: Suppose, on the way to or from a training site (Eastern Washington, for example) where Electronic Warfare practices had occurred on several occasions, the crew or Pilot of a Prowler or Growler, or both, flew over my house and directed a beam or burst of destructive electromagnetic energy at my house. How could that be detected, absent monitoring, supervision, and concern for people like me? As a possibility, I have had that confirmed.

Third. There exists the possibility that the source is pure spite, meanness, and/or a "Screw Him" attitude that should not exist. It is clear to me, that there has developed on Whidbey Island an attitude toward people who live in the OLFC vicinity that is, at best, unfortunate. Many of us, however, (probably the majority of us), are NOT anti-Navy people. We are as God-fearing and as honorable as any of the people who live in Oak Harbor or that are stationed at NAS Whidbey. We have lived productive lives, raised families of children who are excelling in life, and many of us served in the Armed Forces of the United States. For example, one member of my immediate neighborhood proudly flies his Marine Flag daily and served as an Officer and saw combat in Korea. Another member of my neighborhood was a Navy Officer and flew as a "back-seater" in an F-4 in Vietnam; and his Pilot during that service also lives a few miles from my neighborhood. As for me, I served nearly 6 years with a Regular Commission in the United States Air Force from 1964 - 1969, a fun time to be in the military.

A reading over the years of the letters to the editor of the various Whidbey Island Newspapers (an exercise I gladly refrain from participating) reveals excesses on the various sides of the OLFC issues; and reveals a clearcut lack of understanding and empathy. There is no attempt of which I am aware, where the Navy has taken a Leadership role in resolving this unfortunate split in the civilian community of Whidbey Island and, if the Navy pursues any of its recommendations in regarding to increasing flights that utilize Whidbey OLF, that split will become greater for reasons discussed elsewhere in My Comments. In the preparation of the latest iteration of the EIS for Prowlers/Growlers, the Navy has engaged in deceit instead of balanced truth, manipulated data instead of obtaining and using actual data, and ignored the obvious on numerous occasions.

Is it beyond the realm of possibility, given the Navy's apparent attitude reflected in its incessant demands and support of policies that will destroy the ability of people who live in Coupeville or its environs, to enjoy life or even sell their properties and flee Whidbey Island, coupled with strong opposition to the Navy's policies and positions, that a group of Growler Pilots and Crew have been enjoying a "game" of occasionally zapping my home (and perhaps others, as well) with their Electronic Warfare equipment? My answer is "No." What would be the harm if it only involves those worthless persons (██████ and I) who live in a big house with a big garden on the coastline, but under numerous flight paths of arrivals, departures, and FCLP's, yet near OLFC? If so, it is highly unlikely that they have been caught or disciplined. But there are damages that have been sustained and the Navy cannot say that there are not.

Of course, as of this date, I have no evidence other than circumstantial that the Navy, or that Navy personnel, took the action that has cost me several thousands of dollars. But I remain hopeful that someone with a conscience will provide such evidence in the near future. But I believe there are times and opportunities for such action to have been taken, as discussed elsewhere in My Comments.

To date, the losses I have sustained are as follows:

In 2002, I had installed two commercial-grade garage door openers that had remote controls. Both of the openers were "fried" on the same date, but neither of the remote controls were affected. Two new ones were installed on May 24, 2007 at a cost of \$617.31. All of them utilized remote controls to send a signal to the opener to close or open.

An Onkyo TX-NR807 receiver, which cost \$844.67, and which utilized Wi-Fi to communicate with a computer, was fried.

On June 13, 2008, an Apple Airport Extreme router was purchased at a cost of \$179.99 to replace one that had been "fried".

On February 15, 2009, an HP laptop computer was purchased for [REDACTED] at a cost of \$729.99. It was fried a couple of years later. It utilized Wi-Fi. An Apple MacBook Pro was purchased at a cost of \$1,621.74 on April 20, 2016, and still works.

On October 17, 2009, a new TV was purchased to replace one that suddenly stopped working, at a cost of \$2518.48. Both utilized Wi-Fi.

A Logitech Harmony 900 Remote Control which transmitted signals to the Television and cost \$305.80 on October 17, 2009, was "fried."

A third TIVO was purchased on March 17, 2015, to replace one that was fried. Its cost was \$393.28. It utilized Wi-Fi.

On February 25, 2014, another Airport Extreme router was purchased to replace the one listed above as item 3, at a cost of \$216.91.

In 2010, my wonderful 17"-screen Fujitsu LifeBook (Laptop) was "fried" suddenly. It cost \$3,117.

I replaced it on September 22, 2012, with a MacBook Pro Laptop at a cost of \$2199. Between 2010 and September 2012, I used an HP Pavilion Elite 112y that cost \$900. Both are/were Wi-Fi.

The total cost of the equipment that was fried was well over \$10,000, excluding the equipment that could be said to be upgrades, but the cost of which was prompted by one of the several destructive episodes we have suffered.

[REDACTED] has kept actual, originals of all receipts mentioned for the 9 items enumerated, as well as for the whole house surge protector.

If asked, I will sign this document under Penalty of Perjury.

During the same period of time, none of my non-Wi-Fi equipment has failed.

Moreover, we have not experienced any episodes of destruction since early 2015. Maybe some Leadership or Supervision was asserted with a strong message? Maybe there is a new Commander that has made some changes? Or maybe some Navy records already have revealed some suspects? Maybe some discipline was meted. Whatever, I would be satisfied with a letter of apology, but I won't hold my breath.

If you wish to discuss this matter further, you may contact me, [REDACTED], at [REDACTED].

I regret to say that there no longer is an Ivory Tower in my vision.

SECTION 6.

ALTERNATIVES TO OLF COUPEVILLE

Continued use of OLF Coupeville (hereafter OLFC) to conduct FCLP (Flight Carrier Landing Practice) operations, even at the current level of 6,100 FCLP operations per year, is incompatible with the civilian land development that already exists in the vicinity of OLFC. Many of the homes in the Civilian Communities surrounding OLFC and within the Coupeville City Limits have existed since the 1940's, and others have been constructed since then with no effective or honest effort on the part of the Navy, the County Government, or anyone else to warn builders and home buyers of the extent and intensity of Growler noise levels. That is important to understand. If an independent arbiter were to consider the relative equities involved between the conflicting parties of homeowners, the Navy, the County Government, and builders and realtors, it seems clear that, in the absence of effective warnings and disclosures, the weight of the relative equities favors the homeowners. The Navy can build an OLF facility elsewhere for the conduct of FCLP operations and where there will be no unwilling civilians, the Navy can keep its aircraft based at Ault Field and NAS Whidbey, and the Civilains who live near OLF can begin to enjoy the life they thought they had in their present homes.

Further, unless a decision is made to totally disregard the health dangers that presently exist for the civilians that live beneath the aircraft performing the FCLPs, the possibility of increasing FCLP operations by any amount should be a non-starter. Please be informed that there are no EA-18G Pilots or Crew, or families of either the Pilots or Crew who choose to live in any of the neighborhoods within the high decibel or otherwise dangerous zones beneath the FCLP flight paths. Indeed, even the military housing made available for those persons assigned to NAS Whidbey, and their families, are not within the flight paths for FCLP's occurring at NAS Whidbey. In other words, only Civilians, the vast majority of whom have no involvement or interaction or interdependence upon the Navy in any economic sense, live within the OLFC Danger Zones.

While the Navy has cynically avoided even mentioning the possibility or plausability of securing and constructing a new and state-of-the-art-appropriate OLF expressly for FCLP operations, that is a fundamental issue that Congress, The President, and the Secretary of Navy should demand, absent the adoption of a new, cooperative attitude by the Navy regarding that issue. That is to say, the insanity that has destroyed and is continuing to destroy the ability of Civilians to enjoy their lives to the fullest, as well as their wealth in the form of real estate investments, and that subjects those Civilians to more noise terror than is imaginable unless it is actually endured and experienced in person, should be terminated forthwith.

An acknowledged declaration of Vice Admiral Troy M. Shoemaker portrays the relative singularity of the Navy's attitude toward civilians who live beneath the flight tracks of FCLP operations at OLFC: It was filed as Document 48, on May 29, 2015, in the United States District Court for the Western District of Washington at Seattle, in Case No. 2:13-cv-01232-TSZ, and reads in part as follows: "denying electronic attack pilots the realistic training available at OLF Coupeville would mean asking them to flawlessly execute complex and dangerous landings on the deck of a moving aircraft carrier without having performed the same procedures in training ashore under circumstances that, as closely as possible, replicate landing on an actual aircraft carrier at sea. There are alternatives to using OLF Coupeville, but none of those alternatives

provide the flexibility required for the scheduling and execution of local . . . FCLPs, nor do they provide the most realistic training environment. . . .”

Both statements are conclusory in nature and offer no evidence in regard to OLFC. He mentions “alternatives” but without clarity of anything but the singular notion that “alternatives” is a four letter word. You cannot tell if he is thinking about existing landing facilities that are alternatives, or places where presently there are no landing facilities but state-of-the-art- landing facilities designed for FCLP could be constructed. Moreover, there is nothing at OLFC that moves like an aircraft carrier moves. There are groves of tall Douglas fir trees, some taller than 100’ located on private property to the north of runway 14 and to the south of runway 32. There is the main highway of Whidbey Island, State Highway 20, that is adjacent to OLFC on the east side. On the east side of the runways, there is another road, Keystone Hill Road. There is Patmore Drive that is adjacent to OLFC on the north and west of OLFC. Thousands of cars per day travel that highway and roads. There is a sports facility close by that is utilized for childrens’ sports events, that is the location of one of the POI’s for the DEIS. I could go on, but my point seems clear, when I say that if the Navy’s intransigence regarding taking a long look at an alternative location is terminated by common sense or by, for example, a new Secretary of the Navy, or of the Department of Defense, or by our new President of the United States, the inaccuracy of Admiral Shoemakers claims could shine even more brightly.

If, on Government land, reachable by flying in an easterly direction in an EA-18G in less than 10 minutes, a state-of-the-art Outlying Landing Facility is constructed, it could be constructed with design elements that exist nowhere on earth, including OLFC. It could be constructed in a flat area of land having no trees, having no roads, with distracting car lights at night, surrounding the runways, having no civilians bearing the burden of living in the vicinity, and having no innocent children playing sports with unprotected ears, or with pregnant mothers unable to protect the developing ears of their fetuses, beneath FCLP flight tracks. Moreover, FCLP’s could be scheduled without consideration being given to conflicting events being held in Coupeville simultaneously with the the timing and conduct of FCLP’s. And no little town in America seems to have more events and celebrations or art shows throughout the year than Coupeville, in no small part because Tourism goes to the heart of Coupeville’s economy. And Coupeville’s way of life, which is far different from life at Ault Field or Oak Harbor, has existed long before the Navy first landed on Whidbey Island. Coupeville was established in 1851, is the second oldest city in Washington, and has been the County Seat since 1881. The Navy’s bullying tactics regarding the use of OLFC, originally intended only as a temporary facility, threatens the vitality of Coupeville’s economy and its Tourist-based foundation. How many Tourists do you know who wish to spend a week or two or a day or two listening to the roar overhead of Growlers flying low-level FCLP’s?

It is not difficult to envision a new OLF that would provide a far more realistic training environment than presently exist at OLFC, and continue permit all the U. S. Growlers to be based at NAS Whidbey. Presently, more training involving flying occurs away from Island County than that which occurs either at Ault Field or OLCF. Take a look at the flight tracks for arrivals and departures from Ault Field, and you will see that some 53,100 such flights occur throughout the year that do not involve FCLP’s (see Table 3.1-3). That doesn’t include any projections once more Growlers arrive at NAS Whidbey.

Parenthetically, I hope the Navy knows what it is doing basing all the Growlers owned by the USA at one location (Ault Field) in an unprotected Harbor facing West.

Admiral Shoemaker, in his Declaration, also takes the reader through the sequence of events essential to a successful landing on an aircraft carrier. He states: "Landing a tactical aircraft on a moving aircraft carrier at sea poses enormous challenges for even the Navy's most experienced aviators. Aviators must perform a series of maneuvers in a very precise sequence, at specific altitudes, speeds, and power settings, which are very different from a conventional landing. To land on an aircraft carrier, aviators first fly 180 degree descending turns in an oblong "racetrack" pattern over the aircraft carrier. They enter the racetrack flight pattern at 800 feet above seal level and then descend to 600 feet. Aviators then turn and descend at 100-200 feet per minute to arrive at the start point of the final descent. During the final seconds of the landing, aviators make constant power corrections to achieve the exact descent angle, alignment and airspeed so that the aircraft arresting hook touches down in a precise location on an aircraft carrier runway that is moving away from them and can be pitching up and down while also rolling side to side. The aircraft arresting hook then catches an arresting wire, stopping the aircraft, which is moving at over 100 miles per hour, in less than 300 feet. When the aircraft touches the flight deck, aviators actually add power (rather than braking) so that the aircraft can immediately take off again if the aircraft's arresting hook misses the arresting wire. . ."

"Aviators perform this entire complex landing sequence while maintaining a 45 to 60 second interval between aircraft.

The requirements for flying at a precise descent angle, and with a proper bearing alignment and airspeed is the same requirement commercial and private pilots numbering into the thousands of pilots encounter and demonstrate while landing commercial and private airplanes safely at commercial and private airports in inclement and foggy conditions, where you cannot even see the airport until you have descended to a level below the occluded visibility level. There are avionic instruments that simplify the process greatly, but it is true that landing in a fashion that includes a precise spot, as is the case with landing on an aircraft carrier, isn't usually essential in the commercial and private flying world. Further, the Navy's safety record for aviators landing on aircraft carriers is quite high and good, and I would point out that only the Growlers use OLFC. OLFC isn't essential to F-18's and other myriad aircraft that land on carrier decks. OLFC is "essential" only because the Navy has made it so, at least in the collective Navy mind, where only one view is voiced - that of the highest ranking Commander. At least publicly.

Admiral Shoemaker's Declaration also contains a narrative about nighttime landings: "Nighttime carrier landings are even more challenging than daytime landings. At night, aviators lack the visual cues they rely on during daytime landings. At night it is often impossible to discern the horizon or the ocean due to the complete lack of ambient lighting out at sea. The inability to make a determination of relative motion can result in vertigo and confusion. Aviators must rely heavily on their flight instruments and their training. Thus, it is critical to continue this training in an ideal location such as OLF Coupeville, where ambient lighting is minimal, thus replicating the demanding carrier environment as closely as possible. . ."

With the main Whidbey Island highway, and other roads virtually surrounding OLFC, along with the 400 or so homes at the runway 32 end of OLFC and hundreds of other homes and even a well-lit terminal and home base of Whidbey Island Transit, a taxpayer-funded Island-wide bus service center and maintenance center for dozens and dozens of buses of all different sizes, it is a stretch to say that ambient lighting is minimal. It is if you compare it to downtown Seattle at night, but it isn't if you compare it to a carrier at sea.

Admiral Shoemaker's narrative clearly emphasizes the complexity and inherent dangers of executing a perfect landing of an airplane at a particular spot on an aircraft carrier, as well as

the desirability of ingraining the entire process of such landing deeply within the reflexive parts of an aviators mindset that can only come from repetitive practicing. I get that. I live it, at least vicariously by living beneath flight tracks of FCLP's at OLFC. And I get that a Growler weighs in the neighborhood of about 48,000 pounds and has a top speed far in excess of the speed of sound, and I never have heard in sonic boom on Whidbey Island. What I don't get is that Admiral Shoemaker flatly ignores the effects of living with 6,100 FCLP operations per year upon my body, my mind, my longevity, my enjoyment of life, my inability to enjoy my retirement and on and on. No one in the Navy, including Admiral Shoemaker, appears to give a hoot about me or my wife or my neighbors. Instead, all the Navy personnel below him in rank all seem to support the same biased, manipulated documentation that exists in the current and in former DEIS's regarding first the Prowler and now the Growler. Moreover, their DEIS, which is not certified under penalty of perjury, doesn't rely on actual and factual measurements (that are verified by an independent and reliable contractor or verified by civilians that are impacted by such measurements, as with available evidence of verification in the United States Air Force), but rather solely upon computer projections that utilize software that is capable of manipulation as is the case with virtually all software. If it is written by a human, it can be changed or "fixed" by a human). My position is that the Navy is not honorable in its zeal to foist upon civilians levels of noise that are worse than the noise levels now costing the Japanese Government lots of money because of military aircraft noise levels that are intolerable in that venue. In that venue, there are a couple of articles, one very recently, that seem pertinent and may even shift more and more FCLP's from Japan toward Whidbey Island and OLFC. Here are some of those articles:

"Japan gov't ordered to pay more in damages over U.S. airbase noise

"TOKYO, Dec. 1 (Xinhua) -- A high court on Thursday ordered the Japanese government to pay some 950 million yen (8.3 million U.S. dollars) in damages to a number of residents near the U.S. Futenma air base in Okinawa prefecture for aircraft noise.

The Fukuoka High Court's Naha branch upheld a former district court ruling ordering the central government to pay damages but raised the amount of payment from around 754 million (6.6 million U.S. dollars) previously to some 950 million yen.

Some 2,200 residents filed the suit in 2012 with the Okinawa branch of the Naha District Court against the government, complaining of emotional distress and negative impacts on the health caused by the aircraft noise and demanded 1 billion yen in compensation.

The district court ruled in June last year that the government should pay a total of some 754 million yen in damages to around 2,100 of the plaintiffs. Both the plaintiffs and the government appealed the ruling.

A separate lawsuit was filed by 3,395 residents who were not plaintiffs of the previous suit. The district court made a ruling last month and ordered the central government to pay around 2.46 billion yen in damages to the residents, though rejecting their demand for a halt to flights at the base.

The Futenma air base is located in downtown Ginowan city, Okinawa Prefecture, surrounded by residential areas. Local residents have been concerned over flights at the air base causing noise, air pollution and endangering public safety, especially after the crash of a Marine Corps CH-53D transport helicopter on the campus of Okinawa International University in 2004 .

The Japanese and U.S. governments have been seeking to move the Futenma base from Ginowan to the less-populated Henoko coastal area of Nago. The people of Okinawa, however, demand the Futenma base to be relocated outside the prefecture.

Okinawa hosts some 75 percent of U.S. bases in Japan while accounting for only 0.6 percent of the country's total land mass.' [Emphasis added.] (Source: Xinhua 2016-12-01 22:22:19; [news.xinhuanet.com/english/2016-12/01/c_135874026.htm])"

Earlier in 2015, the Japanese Press wrote this news report: "YAMAGUCHI – The Yamaguchi District Court on Thursday ordered the state to pay noise pollution damages to residents around a U.S. air base in Yamaguchi Prefecture but rejected calls to suspend joint flights.

The decision by the court's Iwakuni branch was the first noise ruling concerning Marine Corps Air Station Iwakuni, which is jointly used by the U.S. military and the Self-Defense Forces.

A total of 654 residents filed the suit in 2009, demanding roughly ¥1.8 billion (\$15 million) in compensation for past noise as well as the suspension of some flights.

Presiding Judge Hiroshi Mitsuoka said the court recognized that the plaintiffs "suffered psychologically and sustained health damage" because their ability to hold conversations and sleep was disrupted by noise from the base.

But the court limited the scope of compensation to past damage, deeming there was insufficient data to calculate future damages.

It also turned down the plaintiffs' demands to cancel the plan to transfer U.S. carrier-borne fighter jets to Iwakuni from Naval Air Facility Atsugi, in Kanagawa Prefecture, in 2017 and to impose a total flight ban on the MV-22 Osprey tilt-rotor transport aircraft. . . .

The top government spokesman also said the state was working to alleviate the burden of hosting U.S. bases while maintaining their deterrent power.

Itsuo Yoshikawa, the plaintiffs' lead lawyer, said the ruling was a significant first step toward eliminating noise at the base but added "it was by no means satisfying."

Mitsunori Yoshioka, a 69-year-old plaintiff, said, "It wouldn't be a fundamental resolution unless the flights of military aircraft are suspended."

The plaintiffs live in an area where noise levels register 75 or higher on the Weighted Equivalent Continuous Perceived Noise Level index, an international environmental measurement.

The figures should be at 70 or lower in residential areas and at 75 or lower in commercial and industrial districts under Japanese government standards. . . .

The Iwakuni case has attracted public attention because the base is expected to host 59 fighter jets from Atsugi air base as part of a road map for the realignment of U.S. military forces in Japan, which was agreed to by Tokyo and Washington in May 2006.

The Iwakuni base is expected to become the largest U.S. base in East Asia through the realignment.

Thursday's ruling is perceived by some as a retreat from the Yokohama District Court ruling in May last year, which ordered the suspension of SDF flights at Atsugi air base, as well as the Tokyo High Court ruling in July that upheld it.

The Yokohama court ruling was the first to order damages payments for future noise until the end of 2016, while taking into account the fighter jets from Atsugi that are planned be relocated to Iwakuni." [Emphasis added.] (http://www.japantimes.co.jp/news/2015/10/15/national/crime-legal/court-orders-state-pay-damages-noise-iwakuni-base-flights-not-banned/#.WJN_ZbGZNmA).

It is only a question of time before a sufficient amount of evidence becomes available that similar lawsuits surely are bound to become a fact of life on Whidbey Island. When the Navy loses confidence of people like me, who have a history of excellent and productive military service and who are not looking for a quick buck, there is a serious problem. Ignoring it will not work any longer. Neither will it go away, short of finding an OLF and relocating the burden that is living near OLFC to that OLF, which could be designed to be and could become an actual, existing ideal OLF. While keeping however many Growlers the Navy wishes to keep at NAS Whidbey and Ault Field.

The following are some of the "Alternatives" that exist or could exist, that would alleviate the otherworldly plans the Navy has for foisting dangerously high and debilitating levels of noise on Civilians by adhering to its "Nowhere but OLFC" policy:

1. FCLP Operations Carriers. Thinking “outside the box” for a moment, there is an alternative to OLFC that, in my opinion is worthy of consideration. It is not difficult to reach the conclusion that the OLFC has a limited future life for Navy FLCP operations, the most burdensome aspect of Naval Aviation when the noise generated by those operations is foisted upon a civilian community that has virtually zero interrelationships with the Navy and that receive virtually zero benefit from the Navy other than the benefits to our country of having Armed Forces. Just as it would be unreasonable for civilians who live close to a gunnery range to be subject to being victims of collateral damage from gunnery practice, it also is unreasonable to expect civilians who live below FCLP operation flight tracks to be subject to becoming collateral damage victims of hearing loss, organ damage or destruction, adverse cognitive consequences, and other adverse physiological adverse impacts. Or for fetuses conceived and developed in wombs that happen to live below those flight tracks to be subjected to possible life-long consequences. Expecting a new and ideal FCLP landing strip or two seems like a small step instead of a large one when considering that the cost of a new landing strip might be less than the cost of a single EA-18G Growler.

Former Navy Pilots, who have retired on Whidbey Island, confirm and affirm that the best possible practice landing facility to enhance a pilots ability to execute a safe landing on an aircraft carrier is an aircraft carrier. That is because it is perfectly duplicates landing on an aircraft carrier, unlike a landing strip like OLFC that is surrounded by homes, roads, thousands of mature Douglas Fir Trees, and is 200 feet above sea level and surrounded by a highway and roads. Even as far back as during World War II, the Navy actually thought “outside the box,” during a time when land was far more under-developed and inhabited than it is today. Nonetheless, to facilitate the training of pilots for take-offs and landings on aircraft carriers during World War II, the Navy purchased two Great Lakes side-wheel paddle steamers and converted them into freshwater aircraft carrier training ships. Both vessels lacked hangar decks, elevators, or armaments, to reduce costs. Together, the Sable and Wolverine were used to train 17,820 pilots (Wikipedia, United States Aircraft Carriers). Today, there are at least three actual aircraft carriers that have been de-commissioned and are in reserve, undergoing de-fueling, or on hold for donation. They are the Kitty Hawk, the John F. Kennedy (another John F. Kennedy carrier is under construction) and the Enterprise, and all are owned by the Navy. In addition, several others presently are residing at museums , but their condition is unknown, at least to me. If two of the three carriers listed above or other existing and available carriers, or other vessels, were to be appropriately outfitted and utilized for the limited purpose of creating a carrier-type facility strictly limited to FCLP operations, that arguably would resolve the necessity for OLFC and would resolve the attendant issues and problems accompanying continued use of OLFC that likely will continue to grow exponentially, if Alternative 1, 2, or 3 is selected by the Navy as the future for OLFC. Yet, the economic benefit of NAS Whidbey to the small city of Oak Harbor would continue unabated.

Further, commercial development of the OLFC facility would be a boon to the economy of Whidbey Island, same as in other areas where closure of military bases has resulted in commercial development around the former bases (google Mather AFB and McClellan AFB).

Moreover, those reclaimed, refurbished, or refitted carriers could move or be towed to temporary locations in safe environments on the East Coast and on the West Coast of the United States as needs arise. Mobility, in terms of moving a limited-use carrier to a climate that more likely matches the then existing “crisis” area, or that is geographically closer to such an area, would seem to be a far better scenario than the present system or projected system to do all FCLP’s at OLFC, save for 20 percent, maybe.

Capture, if you will, a momentary vision of one such carrier in the middle of the Bay Area of California, or off the coast of Santa Barbara, California, or San Diego, or Seattle, or the Puget Sound, and a day in which a hundred or so FCLP operations are executed. Would that be a tourist attraction? Would it possibly stimulate interest in Naval Aviation? Would it have beneficial PR attributes for the Navy? Would it be popular with civilians who live in the vicinity of OLFC? I think the answer to each of those questions is obvious. One final question: If it was good enough to do during a national crisis such as WWII, why could it not be good enough for today? I can't say what the cost would be, but as an alternative to a new OLFC landing strip to replace OLFC, the cost may well be a wise investment once consequences of living below Growler noise caused by FCLP operations become widely known and acknowledged by the courts.

2. OLF's on Indian Lands. One of the features of land in the Western part of the United States is the existence of Indian Reservations. There are many in both Oregon and Washington. Indian Tribes have the ability to control development or no-development on their lands, and in many respects exercise sovereign authority over the lands, including state-level taxation. In addition, many Tribes enter into construction contracts even to build airports. Constructing an OLF on Indian Lands theoretically could give the Navy contractual rights to build and use an OLF or two according to the terms negotiated in the contract. One term, in favor of an Indian Tribe, might well be a new school or some new housing 10 or so miles away from the OLF but still on the reservation. If certain lands on a reservation have no residents within even say a 40 dB DNL noise contour, maybe the Navy could make all the noise it wants and without hiring people to "man" complaint lines. Far fetched idea? I don't think so. It depends in part on location.

I point out that there are coastal reservations and there are reservations in the desert. Both seem to have comparative advantages.

It also depends upon the Navy reaching the reasonable conclusion that the "old" way of forcing its will upon a growing and unwilling public, as is the case in the communities surrounding the OLFC, and manipulating the data in a way that ultimately will come back to haunt the Navy, is over and done. New OLF's for both the "EA's" as well as the "F's" will become a reality. That can and should happen now, not next decade.

3. New OLF on Uninhabited Federal Lands. The Navy and the United States own thousands of acres of land in the Western states, including Washington, upon which multiple landing strips could be constructed and FCLP's could be practiced and performed with virtually no civilians beneath the flight paths, and future civilian development near flight paths of a new FCLP facility could be prohibited, as it should have been but is now too late for OLFC. Also, please note that the infrastructure required would not include many buildings. Indeed, at the Whidbey OLF, there are very few buildings other than the flight control approach radar, and a few other very basic-looking buildings. EA-18G's can be moved from one location to another very quickly. Indeed, low level flying training and some Electronic Warfare training for Growlers assigned to NAS Whidbey already is currently conducted in Eastern Washington and Oregon, where there are far more rodents than people or structures of people, including towns, hospitals, schools, and homes.

it should be noted that the cost of a single Growler is in the vicinity of \$100,000,000 dollars. The cost of constructing a new and ideal FCLP landing strip or two on Government Lands could and should be less than that cost for one Growler, and likely would be in an area with no civilians

living below the flight paths. It is clearly too late for that ideal landing strip to be OLFC unless the Navy condemned and purchased all homes on Whidbey Island below the flight paths, or within the noise contours as drawn and shown in the DEIS.

4. NEW FCLP-Only Landing Strips. The Navy could add two additional landing strips at NAS Whidbey, on Navy-owned lands, and by way of eminent domain, and could buy or “take” through eminent domain the relatively few privately owned homes that may be situated beneath new FCLP flight paths. Noise issues are lessened by distance and a suitable distance could be prescribed in new flight path tracks that would tend to minimize noise-related issues. Further, those flight tracks could be designed so that the vast majority of the flight paths would occur over water.

5. Buying Land on an Uninhabited Island in the Pacific Northwest. The Navy could be compelled to reject their absurd judgment that it is fair and reasonable, and not a gross abuse of power, to subject one inhabited island in America to the horrific, indeed sometimes terrifying, noise generated by their EA-18G’s. To increase from 6,100 to 35,100 the number of FCLP operations proposed to be forced upon the civilians living near OLFC and the community of Coupeville likely could be determined to be an unconstitutional abuse of power and a denial of procedural and substantive due process required by the United States Constitution. The cavalier attitude of the Navy reflected by the DEIS could become the cornerstone of a legal effort making those allegations. Finding another location for OLF’s is a reasonable solution.

Increasing the number of FCLP’s performed at OLFC in the manner proposed in the DEIS would not only subject residents who live beneath the Flight Tracks to unimagined health risks, auditory and non-auditory alike, and would devastate wealth of many Americans who already have put in their time as loyal American citizens and have worked all their productive lives. That includes me. My home, completed in 2002, is valued at over \$2,000,000, based upon the USAA Insurance Replacement Appraisal, the waterfront Lot value as assessed by the county, and the Garden and View.

The Independent study of the situation at Luke AFB, regarding the F-35’s, is instructive and frightening, to me. Pertinent are the following portions I have quoted:

“The development potential of approximately 33,000 acres in the West Valley communities surrounding Luke AFB has been constrained by these [government regulations] (Luke Forward Campaign 2009). Some incompatible development occurred before these restrictions took effect. . . .”

“The Impact of Aircraft Noise on Property Values. The negative effect of airport/aircraft noise on property values is a well-researched/documented issue. There are dozens of published studies on the topic, all of which come to the conclusion that property under or nearby the flight corridors of airports experiences diminution in market value.”

“One of the most important studies was conducted for the Federal Aviation Administration in 1994. The results indicated a consistent negative impact of aircraft noise on residential property values. For the area surrounding the Los Angeles International Airport (LAX), in the case of moderately-priced homes, it found a 1.1 percent loss in market values per dBA above a “quiet threshold.” For the John F. Kennedy Airport (JFK) in New York, the loss in market value for moderately-priced homes was estimated at 0.5 percent per dBA. (Bell 2001).

Studies of the environs of LAX, Ontario, and John Wayne airports in southern California estimated the negative impact of values of single-family residences ranging from 15 to 43 percent – averaging a 27 percent loss in market value. The studies also included analysis of the impact on non-residential property and found significant negative effects on commercial space.

A 2004 study that synthesized the results from 33 studies of airports in Canada and the United States over the 1969-1997 period estimated a range for the loss in residential property values of 0.5 to 0.7 percent per dB for levels up to 75 dB. The study indicated that the noise discount would be substantially higher for areas that are affected by noise levels higher than 75 dB (Nelson 2004). These statistics imply that the value of a moderately-priced home located within the 65 DNL noise contour would be about 9 percent lower than an equivalent home located in a neighborhood not affected by aircraft noise."

"The analyses of the Southern California airports found more severe effects of aircraft noise on property values. The 1.1 percent loss in value per dB estimate from the LAX study would imply that the loss in value of a home within the 65 DNL contour would be almost twice as large at about 17 percent."

"Negative Economic Effects of Existing Noise Levels
Impact on Property Values"

"A substantial portion of land zoned for residential use in El Mirage, and some areas zoned for residential use in Surprise and Buckeye are located within the JLUS 65 DNL. The values of existing homes in these areas are substantially lower than they would otherwise because of their location in the vicinity of Luke AFB and subject to high levels of aircraft noise. Based upon the results of the studies cited above, estimates of the magnitude of lost value would range from 9 – 17 percent. In dollar terms, this would mean that the value of a home located within the 65 DNL noise contour otherwise valued at \$150,000 would be worth \$14,000 to \$26,000 less than an equivalent home without aircraft noise."

"Negative Economic Effects of the F-35's Higher Noise Levels
Impacts on Property Values"

"Evidence from testing indicates that the noise levels associated with the F-35 compared with the F-16 are anywhere from about 10 to 20+ dB higher. Using the lower bound of an increase of 10 dB would imply a loss in value in the 6 - 11 percent range for homes in the areas affected by the higher noise levels, while a 20 dB increase would imply losses in value in the 12 - 22 percent range. Losses of these magnitudes would be equivalent to dollar losses of \$9,000 to \$33,000 for a \$150,000 home."

"Because of the higher noise levels associated with the F-35, the area significantly impacted by aircraft noise will be much larger than was the case with the F-16, and more residential areas with many more homes will be affected. As described in the previous section, virtually all of El Mirage, Youngtown and substantial areas in Sun City, Surprise, Litchfield Park, Goodyear, Buckeye, and unincorporated Maricopa County will become subject to aircraft noise levels high enough to affect property values."

"Thus, the higher noise levels would result in declines in the market value of residential properties of hundreds of millions of dollars in these West Valley communities. The case of El Mirage offers the clearest example, since virtually all of its residential areas would be covered by the F-35's 65 DNL noise contour. Residential property owners in that city alone could suffer overall losses in the \$200 million range, based on the mid-point of the percentage losses in market values cited above." (archive.azcentral.com/ic/community/pdf/luke_air_force_base-noise-study-0414pdf), An Evaluation of the Potential Loss in West Valley Home Values from Locating F-35 at Luke Air Force Base, Timothy D. Hogan, Ph.D.).

An "Evaluation" of the consequences upon property values at OLFCA would seem to be in order, if the Navy seriously thinks the best thing to do in view of the Navy's short-sighted planning (at least the publicly disclosed portion of Navy planning) is to burden all families who live in Coupeville and its environs by imposing an intolerable level of FCLP noise upon civilians who have no economic benefit coming from the Navy See Sec. 3 Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy; and Sec 4, DEIS' Economic Benefits to Coupeville and its Environs Means Negative Impact Burdens, My Comments).

Navy expectations that it is ok to subject living Americans to the extreme Noise-Terror that would accompany living below flight tracks of Growlers executing FCLP's increased from present levels by up to 575 percent is beyond realism. There are too many reasonable people in Washington and in Washington D. C. to permit that to continue for the next 40 years, the expected life of an EA18-G. It is time for some conscience to reign in the Navy. It is not clear that the Navy has one.

I will make this offer to Growler Pilots and their EA Crewmate. You are welcome to spend an afternoon at my home, on a busy FCLP day at OLFC. You may spend the afternoon in my garden, and enjoy the view and the beauty; and try to enjoy it at the same time Growlers are performing; and my wife will be as gracious as any host you ever have encountered. You don't need to bring hearing protection. The Navy hasn't issued a warning for any hearing or other health dangers.

Message to the Navy: I don't believe anyone will show up, or stay if they do show up on a busy FCLP day.

SECTION 7

DEIS BIAS: BENEFITS FROM NAS WHIDBEY

The DEIS, at Section 4.2.5. states that “The most appropriate means of differentiating between the impacts caused by the different alternatives and scenarios is by comparing the total estimated population within the DNL noise contours between the alternatives.” While it is true that it is a way of differentiation, that conclusion that it is the “most appropriate” is belied even by just a little bit of honest analysis that cause that “most appropriate” claim to become superficial and inherently biased. It neither recognizes the basic, fundamental differences between two reasonable and decent cities. Their histories and present economic structures could not be more stark nor different (see Section 3, Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy?; and see Section 4, DEIS' Economic Benefits to Coupeville & Environs Means Negative Impact Burdens, My Comments). Coupeville's right to continue to exist as it has since 1851 (it is the second oldest town or city in Washington) is required by NEPA to be protected, not destroyed. Perhaps, it is merely reflective of a view that entails an Admiral up the ranks from NAS Whidbey, who already has made up his mind, and demands those below him/her support this conclusory statement as a way to implement his/her favorite proposal. Further, it is clear that actions by the federal government, which the Navy obviously is a part of, is subject to the limitations expressed in the United States Constitution. It is a fundamental right, under our Constitution, that actions of the federal government that affect and essentially classify citizens of Coupeville and its Environs in a discriminatory manner will be held to violate the Due Process Clause of the Fifth Amendment to the United States Constitution. A decision based upon the assumption that it is “most appropriate” to stick-it-to Coupeville and its Environs because there are fewer residents there than at NAS Whidbey and Oak Harbor, in my opinion, would be determined by a Federal Court to be an action made in violation of the Fifth Amendment.

That highly offensive and inaccurate statement, contained in the DEIS, is nothing more than a conclusion unsupported either by evidence, data, or rational argument. It is devoid of value as a defensible decision. One major basis of differentiation, that is not reflected in the DEIS, is as to the relative level or type of interaction between the Navy and the area around NAS Whidbey, compared to the interaction between the Navy and Coupeville and its Environs. If you consider that the NAS Whidbey Complex in Oak Harbor includes approximately 7,090 military personnel and their families, and employs about 2500 civilians, most of which have families, and houses vastly more of both groups, it follows that there is a strong, interdependent interrelationship between the Navy and Oak Harbor. Further, for the past decade (I didn't check back beyond that), fully 50% of the students in Oak Harbor Public Schools have parents who are stationed at NAS Whidbey, or who otherwise work at NAS Whidbey. Those two groups of people support and “feed” many of the private businesses that provide amenities and services in Oak Harbor. Even in the town of Anacortes, which is not even in Island County (both Oak Harbor, Ault Field, Coupeville, and the OLF are in Island County), the figure for students in the Anacortes Public Schools from those two categories of “Navy-related people” exceeds 10 %. In Coupeville, it is less than 10 %, and has been declining. Military personnel by and large choose not to live in Coupeville. Coupeville is not a Navy town. Oak Harbor is a Navy town. The obvious and primary source of employment among Oak Harbor residents is NAS Whidbey. The economic value or benefit of the Navy to Oak Harbor is huge. In Coupeville, the economy, town's ambiance, and attractions are not Navy-based. It is Tourist based. It is small-agriculture-based.

It is locally-owned restaurants-based. It is locally-owned shops-based. The two towns are hugely different. I'm not saying that one is superior to the other. Some people even like both. For me, I am a Coupevillian by choice of lifestyle. Coupeville is a great town for retirement people. I am far more comfortable in Coupeville. I even obey the slow speed limits. But the Navy is seeking to destroy all of that apparently without even considering the possibility of the adverse impacts of its proposals. The DEIS also avoids any analysis of the unique nature of the economy of Coupeville, or its attractions to so many Tourists who definitely won't want to come to Coupeville and be forced to listen to Growler noise of near or well over 120 decibels per FCLP flight tracts that are several miles wide and about 4 times as long, flying as loud as a tornado. 36,100 times per year. Round after round the flight track. Except Coupeville could get its economy knocked out before too many rounds. But that wouldn't stop the Navy.

In any event, contrasted with Oak Harbor, where there is major economic dependence upon NAS Whidbey, Coupeville derives scant value or benefit from the Navy. Thus, to say that population is the best way to compare the impact of the proposals is to compare population is preposterous. Indeed, it is to compare apples to dirt. It also would be a way to impose the largest noise burden (it absolutely is not a benefit) of the proposals, represented by Scenario A or Scenario B of each of Alternatives 1, 2, or 3, upon the smallest community and the only one of the two communities that is opposed to all Scenarios in all three of the numbered proposals. The Mayor of Oak Harbor just announced publicly a barn storming trip of city officials to Washington D.C. to lobby in favor of more Growlers for NAS Whidbey. For Oak Harbor, that means more jobs. You won't find city officials from Coupeville joining the Oak Harbor delegation. Coupeville is quoted in the Oak Harbor newspaper as opposing any more Growlers at OLFC. Oak Harbor would gladly accept more Growlers, but of course, the fly in the pie is that Ault Field cannot handle the additional FCLP operations, so the Navy, with their short-sighted planning, is willing to accept all the Growlers owned by the Navy to be Ault Field-based, but wants to increase the number of FCLP's at OLFC from the current 6,100 FCLP's (an already intolerable and dangerous level, up to an obscene 35,100 FCLP's.

Most of the Citizens who live near OLFC and in Coupeville absolutely do not want that to impact their lives and their wealth. It will damage our hearing health, and would result in higher risks in other, vital areas of health, notwithstanding Navy assurances to the contrary. Those "assurances" do not withstand close scrutiny and are ill-advised and inaccurate. There are numerous studies that reach conclusions contrary to the Navy's assurances. Further, the Navy's decision regarding OLFC likely will seriously degrade and depress our home values more than now. It would be a disaster. The Navy clearly needs to find another OLF location that will not torture Civilians with their unwanted noise. Think of it - the Navy is projecting to increase FCLP operations at OLFC from 6,100 FCLP's per year up to 35,100 per year. That would be tantamount to the Navy Declaring a Noise War against the Civilians who primarily live near OLFC, as well as Economic War against Coupeville. We deserve more consideration, consistent with limitations upon the Federal Government and the United States Navy by the Federal Constitution and Federal Laws.

The DEIS contains a Table indicating both the estimated geographic acres and the estimated population that resides within the contour ranges of 65-70 dB DNL, 70 to 75 dB DNL, and higher than 75 dB DNL, and makes the contradistinction between the acreage and population of Ault Field and OLFC. This is another reason why the DEIS is either purposely slanting the data to support the obvious preference of the Navy for a 20%-80% split of FCLP's for Ault Field getting 20% and OLFC getting 80%. The contour lines throughout the DEIS are drawn for Ault Field and for OLFC using two different methods. For Ault Field there are lobes drawn from the end of each Runway extending out as far as 10 miles from the "Runway endpoints. The extra length of

the lobes on the contours is said to be “primarily due to the Growler on the GCA patterns [ground controlled landing approach] where the aircraft generally descends on a 3-degree glide slope through the 3,000 feet level” 10 miles from the runway. Similar lines are not included for the OLFC contours, notwithstanding that hundreds of Growler flights are executed in a direction that includes flying directly over OLFC that represent flights from Ault Field (at a 300-450 knot speed (my observation) preliminary to entering the closed-loop FCLP tracks at OLFC, or that represent flights exiting FCLP closed-loop patterns at OLFC and departing from OLFC (like directly over my home) and ascending to one of all sorts of levels and invariably at a much higher speed than the speed of a closed loop, some of which may even include Growlers utilizing afterburners. These flights, typically, would be return trips to Ault Field for fuel, food, or rest between sessions. If there are 5 Growlers involved in FCLP operations and flying in the same session, each would execute some number of closed loops flights involving a Touch and a Go on each loop (unless a “touch” is waived off because of one or more of several factors involving positioning, wind, speed, altitude etc.). The point, however, is that each Growler will have an arrival to and a departure from OLFC for each session. Those flights are over land that are not reflected in the contours drawn for OLFC. Typically, an 8 - 10 hour FCLP schedule may include 4 or 5 sessions. Doing the math will show that for one flying day at OLFC involving five Growlers and five sessions, there will be 25 arrivals and 25 departures that are not reflected on any Contours for OLFC, but are reflected on the Contours for Ault Field. This is but one example of many that tend to show that the DEIS, indeed each DEIS that I have looked at since 2005, understates the predictable noise at OLFC compared to Ault Field. That is only one reason why the DEIS should be rejected as a serious or fair description or prediction of noise preferred to be foisted unilaterally upon the communities surrounding OLFC.

Moreover, Table 3.1-3, entitled Annual Modeled Affected Environment Operations At Ault Field and OLF[C]” is more evidence of the slanted bias of the DEIS in favor of unilaterally imposing noise upon the the unwilling communities surrounding OLFC. That Table is attached for your convenience at the end of this Section. Notice that for Ault Field, under presently existing experiences, the number of FCLP’s performed at Ault Field is 14,700 and for OLFC is 6,100. Then, if you look at the numbers for “Other Operations” the number for Growlers at Ault Field is 53,100 and for OLFC is a big fat zero. Is that an accurate depiction of facts, or are those “alternative facts”? The DEIS contains in Section 3.1.2 a discussion of why a different metric should not be used in describing the extent of operations at Ault Field and at OLFC, but does not defend the exclusion from the OLFC Contours the full measure of noise emanating from flights over OLFC at relatively low altitudes when both are in a high noise, powered mode of flight that are departures from or arrivals at Ault Field. To my way of thinking, noise is noise wherever it originates. The DEIS considers, for contour drawing purposes, noise generated by Growlers arriving at Ault Field that departed a NAS other than Ault Field, and considers noise generated by flights departing Ault Field but doesn’t consider noise at OLFC as including noise that is generated by Growlers that fly directly over the OLFC on an arrival at or departure from Ault Field not involving FCLP operations.. As a result, the flight operations stated in Table 3.1-3 are an inaccurate comparison of flights that generate noise in the Contours drawn and presented in the DEIS. That is merely another of the many negative biases contained in and reflected by the DEIS, which speaks for the Navy at NAS Whidbey, not for OLFC. Footnote 3, accompanying Table 3.1-3, is interesting and it may be seen on page 3-14 of Volume 1 of the DEIS, and reads as follows:

“3 The term “Other Operations” includes Touches-and-Goes, Depart and Re-enter, Ground Controlled Approaches, and Carrier Controlled Approaches. . . .”

Maybe that statement should be revised to say that Touches and Goes are included/counted for both Ault Field and for OLFC, but all other overflights and arrivals and departures at or from

OLFC are not included for OLFC, but are, of course, included in the “facts” attendant to the drawing of Contours for Ault Field. Thus, that language supports the view that the contours show more people would be impacted in Oak Harbor than in Coupeville. The degree is the issue. In the DEIS, the degree is affected directly but not fairly, in my opinion.

Figure 3.1-3 is entitled Aircraft Arrival and Departure Flight Tracks at NAS Whidbey Island Complex and shows about 10 separate arrival flight tracks for aircraft, including Growlers, arriving at Ault Field on flights not involving FCLP operations at OLFC. Those are among the flights that are considered in the DEIS in the drawing of Contours for Ault Field and tabulated for multiple purposes including establishing DNL figures, but not considered for any purpose in tabulating figures or drawing Contours for OLFC. Nonetheless, those flight arrivals in fact generate a high level of noise in the vicinity of OLFC. I can say that firmly, accurately, and honestly by virtue of having lived in the same home near OLFC since 2003. On Figure 3.1-3, the “departure” flight tracks are depicted in pink and none of the lines in pink are indicated to fly directly over the vicinity of OLFC. My experience in the past 13 years leads me to say firmly, accurately, and honestly that there are many more days in the year in which departure flights from Ault Field fly directly over my home and OLFC than there are flying days in any of those 13 years. Moreover, many of the flights have a noise profile having a very high intensive noise level and a sound duration period of time at least three or more times as long as the duration of a noise profile for any single Growler executing a FCLP. Further, the noise on both departure and arrival flight tracks often is magnified and accentuated because of variables such as multiple Growlers in a group formation, the ascent is with full power, or the arrival flight is descending from a very high speed and high altitude, thereby accentuating the noise emanating from the Growler or Growlers in flight at the time; and often involves multiple aircraft.

Similarly, Table 4.2-1 shows the estimated acreage and population within the “DNL Contour Ranges” for both Ault Field and OLFC and other tables are included elsewhere for each of the Alternative proposals.

Historically, there seems to me to be an underlying Navy bias in favor of increasing the number of FCLP’s more for OLFC than for Ault Field. The DEIS, as I have shown, is structured in a way that supports that conclusion, but it isn’t limited to the DEIS. For example, there is a document bearing the signature of the then Base Commander of the NAS Whidbey Complex, Captain Michael Nortier, and signed under Penalty of Perjury. The document is a Declaration in support of the Navy’s opposition to a Plaintiff’s request for an Injunction: That Declaration in part states: “The population surrounding Ault Field is greater than that surrounding OLF Coupeville which means noise impacts from aircraft operations at Ault Field impact a greater number of people than at Coupeville.” a footnote, numbered 2, states as follows: “Population data shows that in 2010 Coupeville, Washington, population was 1831 and Oak Harbor population was 22,075.” While those numbers are accurately quoted, they are misleading and deceptive and, in my opinion, reflects the existing and continuing Navy bias to which I refer and which I believe is real. It is simply a superficial, conclusory position devoid of merit as a basis upon which to reach a conclusion.

OLFC is NOT within the city limits of Coupeville, and OLFC encompasses far more people than the population within the city limits of Coupeville. Also, I point out that the data to which Captain Nortier referred includes statistics for all of Island County, in which both Coupeville and Oak Harbor are located. The population for the entire county is said to be 78,506, of which 28,438 is located outside the city limits of those two towns as well as all other towns in Island County. Indeed, 100 percent of the population surrounding OLFC resides outside of the city limits of Coupeville. While I do not ascribe “Perjury” to the actions of Captain Nortier, I suspect

he or his staff had a motive hidden by his choice of words. Or maybe it was just sloppiness and incomplete research or incomplete thoughts by his staff. Worse, however, is that Captain Nortier seems to have been very comfortable with making a statement belittling the communities surrounding OLFC as being more “worthy” of more noise than the community of Oak Harbor because Oak Harbor has more population. He doesn't bother to point out that the economy of Oak Harbor is directly dependent upon NAS Whidbey or that the economy of Coupeville is dependent to a large extent upon Tourism and small-farm agriculture, as well as being the county seat. Tourism and FCLP's are like oil and water. They don't mix. Tourists come to Whidbey Island often to “escape” from the business of their lives elsewhere. Coupeville is laid back, not hustle/bustle, and definitely not captured by what could be Captain Nortier's mantra assumed to be “More Noise For Coupeville Because They Have Fewer People Than Oak Harbor.”

Consider the relative benefits to the respective communities of Oak Harbor and Coupeville, of being located close to NAS Whidbey or to OLFC. Oak Harbor derives a very large economic benefit from NAS Whidbey, in the context of real estate values in the price ranges that are popular with Navy personnel and residents that obtain employment directly or indirectly from the Navy. What would happen to the economy of Oak Harbor if NAS Whidbey was closed? At least for a few years, the Oak Harbor economy would collapse or be in an economically depressed state. Not so much for Coupeville. There might be a little downturn, but its shops and restaurants derive more business from Tourists and Whidbey Islanders who live close to Coupeville, and likely would survive. It would be quieter and more conducive to more Tourists seeking quiet, solitude, peaceful surroundings in which to relax.

Further, I believe it is accurate to say that even the lovely community that is Anacortes, which is located in Skagit County, unlike either Oak Harbor or Coupeville, receives a larger overall benefit from NAS Whidbey than Coupeville. It is the case that noise associated with Ault Field is acceptable to a far greater percentage of the resident population in Oak Harbor than it is by Coupeville, and jobs, jobs, jobs, is the driving reason why that is so. In that regard, a Department of Defense document, (See militaryinstallations.dod.military) states that in the context of NAS Whidbey, there are 7,050 military personnel and 14000 dependents, 2,400 civilians jobs and contract employees and about 5,000 family members, plus even 50 Canadian members of the Canadian military and their families. Those numbers are projected to increase significantly in the relatively near future. Thus, there are more people dependent upon employment or military service at NAS Whidbey than the entire population of Oak Harbor, but the Oak harbor population likely does not include persons residing on-base or in Navy housing.

In contrast, there is a paucity of interaction between the Navy and the people who live in the neighborhoods surrounding OLFC. If you consider the lack of interaction and the virtual absence of economic benefit to the OLFC neighborhoods, there is a huge difference between a comparison of Oak Harbor and Coupeville, in the context of who merits more FCLP operations. Moreover, there are numerous topographical maps in the DEIS showing runways for both OFLC and Ault Field. I invite you to take a close look at two maps for the purpose of comparing density of houses within one mile of the Runways. For Ault Field, Runways 14 and 07 appear to have no houses between the end of the runways and the ocean, Runway 25 has few houses between the end of the Runway and on into Dugualla Bay. Runway 32, which is seldom used for FCLP's does have several houses before reaching water either at Dugualla Bay or beyond the Seaplane Base, which is part of the NAS Whidbey complex. In comparison, Runway 32 at OLFC, since the arrival of Growlers, has been used far more than Runway 14 for FCLP powered-landing approaches preliminary to the “Touch” portion of a FCLP and also receives considerable noise from the “Go” portion of a FCLP when Runway 14 is used. Topographical

maps show dozens of homes at the end of the "clear" zone of Runway 32. That comparison draws into serious question the accuracy and validity of Mr. Nortier's comment to the effect that FCLP's impact a lot more people at Ault Field than at OLFC, if you consider the number of people who are exposed to 75 DNL or more. Moreover, Mr. Nortier's claim doesn't address at all the economic impact upon Coupeville and its environs of even the No Action Proposal, much less Alternative 1, 2, or 3 in each of the three scenarios proposed as possibilities in the DEIS. But that seems to be the standard of analysis replete throughout the DEIS.

This discussion leads to the final point that, in view of the fact that the Navy is moving to Ault Field ALL of the Growlers owned by the United States to NAS Whidbey to become their home base for all training and FCLP's, that would be a decision that could not withstand close scrutiny, in terms of the uncompensated burden it would impose upon the Civilians who happen to live near OLFC and who have scant connection or interaction with NAS Whidbey. Those citizens are not the enemy of the United States Navy and should be protected from having their lives and property wealth destroyed by an overly aggressive and short-sighted, and apparently uncaring Navy. Indeed a Navy that apparently is led by men willing to engage in unconscionable, un-American behavior, as by subjecting Civilians to the noise that comes with Growlers. It is absolutely time to close OLFC and find another location or alternative to imposing upon the residents of the neighborhoods surrounding both FCLP landing strip the ever increasing burdens of noise, that are not offset by benefits, upon thousands of unwilling recipients of dangerous levels of noise. The extent of the noise dosages are not provided in the DEIS. You, the reader, should ask why not? Because of noise levels, hearing health issues, and other health issues, not to mention the risks to the economic health of Coupeville and its environs, maybe now is the time to demand a serious inquiry at the local level, by the highest levels of Navy Command, and by the appropriate committees of the United States Congress. Maybe it's time to tell the Navy that now is the time to find a permanent solution to its FCLP landing strip by finding a location that avoid all issues respecting civilians living beneath FCLP flight tracks. It's time to stop imposing high and dangerous levels of noise unilaterally upon civilians having scant connection or interaction with the Navy to bear the noise burden resulting from the Navy's poor decisions of the past.

SECTION 8.

DNL, NIOSH, & OSHA: On Noise Exposure Doses

DNL is not an actual measurement of noise, but rather a 24-hour, day/night average. Thus, the entire 24-hour period of time is used. Why it is important to use both noisy time and sleeping or quiet time is an interesting question. The answer is that is just the way it is done. That 24-hour average could include data from one day, one average flying day, one week, one year, or any other period of time. Considering that the Navy claims it conducts FCLP operations at OLFC only approximately 45 days per year, you might think that the 24-hour day/night average reflecting Growler noise on those 45 FCLP-flying days might be the appropriate time period to reflect sound averages on those days. Not so much. The Navy's average is for the entire year. It includes every day of the year. The result is a much-diluted number, expressed in decibel levels that don't really exist, and then to draw contour lines for various levels of "DNL" numbers. Historically, there have been studies to determine for example the threshold expressed in the DNL's, at which complaints about noise levels have started or that reflect percentages of people who are "highly annoyed." That category of people has been reflected in the history of the development of airports as well as land-use planning.

My favorite quote about "DNL" is contained in a document advocating the "Abandonment of the Current Day-Night Level Noise Standard of 65 dBA DNL," from the website of the NPC-Noise Pollution Clearinghouse and it is:

"A punch from Michael Tyson, averaged over an hour, is equivalent to a love pat." The averaging hides the impact. It would be further diluted if averaged for an entire 24-hour period.

One indicator of the appropriateness of using primarily the DNL 24-hour Day-Night average to determine the risk to Civilians who live private lives in homes near the OLFC is to compare the use of that standard with the manner in which the Navy collects and assesses noise in other settings. Search results from "Googling" combinations of words such as Navy, noise, exposure, Navy Medicine, and high noise sources, for example, reveals the existence of a large number of reports, studies, surveys, charts and other documents, many within the past 10 years, that clearly signals the existence of serious Navy concerns about high-levels of noise, including disability costs in the context of Navy personnel and civilian employees. But nothing about consequences of living in a home in a neighborhood inundated with noise from FCLP's. A review of those documents yields one striking result. In that body of research and analysis, it is difficult to find even one that relies primarily on the DNL standard of noise exposure, in contradistinction to the DEIS.

DNL standards comprise the primary tool of analysis in the DEIS and may facilitate a finding and decision of "No Significant Impact" for any of the proposals contained therein. In other situations, like cockpits, flight decks of aircraft carriers, engine rooms, and numerous other areas where people work, the noise metric of DNL generally is not mentioned. Instead, actual numbers, expressed in dB's or averages or time-weighted averages are collected and then assessed. In one Navy document regarding noise, the document declares that "this chapter provides the basic information necessary to evaluate and document employee noise exposure and to assist with determining compliance with Department of Defense (DoD) noise instructions

(www.Med.Navy.Mil/sites/mmcphc/Documents/industrial-hygiene/HFOM-Ch.5.pdf. In another, the Defense Safety Oversight Council Initiative contains numerous charts, including one entitled "Nine DoD High Noise Sources and One Promising Technology, which references the length of unprotected exposure time in various work environments encountered within the Navy workplaces, all of which, except one, are lengths of time less than a full minute for exposure to levels of noise expressed in decibels (dBA)(www.public.Navy.Mil/NAVSEFECGN/Documents).

My point essentially is that the DEIS does not concern itself, or express Navy concern for noise exposure for any category of Civilians who will be exposed to noise levels that, if it were a Navy workplace, the Navy would encounter legal obligations, if the noise exposure measured in decibels and in duration meets certain threshold levels, to provide hearing protection devices suitable for the working environment, warnings about exposure in terms of exposure time limitations, and restrictions on duration of exposure. Notwithstanding that the DEIS is threatening to increase FCLP's from 6,100 to 35,100 at OLFC per year, but is not providing the noise exposure projections based on a suitable metric that is not DNL for all the FCLP anticipated to be executed in a day, a busy day or a month, or whatever. That statistic is useless if expressed in a way that dilutes actual measurement with the noise exposure while sleeping.

Next, I wish to refer to a document entitled Noise Exposure: Explanation of OSHA and NIOSH Safe-Exposure Limits and the Importance of Noise Dosimetry, prepared by Patricia T Johnson, AuD, of Etymotic Rsearch, Inc. The document states, as follows:

"It's a noisy world, and hearing damage from loud sound affects millions of people. Noise-induced hearing loss (NIHL) and associated disorders of tinnitus, hyperacusis and diplacusis are all irreversible. This is a tragedy, considering that these often debilitating conditions are preventable. The keys to prevention are in understanding the risks and consistently acting to minimize the risks." I have attached to this Section of my Comments, a copy of the Johnson article. It is well-written and easily understood. I think.

Dr. Johnson presents the case that there is new evidence confirming the existence of a greater need for monitoring in view of new research that concludes "that noise can produce subclinical damage that goes undetected, progresses unnoticed, and really manifests itself long after the fact. We can't measure this subclinical damage using audiometric tests, including the "gold standard" for testing NIHL: pure tone hearing thresholds. Data collected over many years from persons exposed to industrial noise shows that most NIHL develops over the first 10-15 years of noise exposure and then asymptotes (levels off). From a preventive standpoint, the sooner we identify hearing risk and minimize it, the better. We need to educate our young people and equip them to protect their hearing at an early age, ideally before damage occurs. To do this we must monitor noise exposures to assess risk and use hearing protection when necessary to reduce the risk of NIHL."

In the United States, the Occupational Safety and Health Act of 1970 created two organizations, OSHA (Occupational Safety and Health Administration in the U.S. Department of Labor); and NIOSH (the National Institute for Occupational Safety and Health in the Center of Disease Control and Preventions in the U.S. Department of Health and Human Services. OSHA develops and enforces workplace safety and health regulations, while NIOSH conducts research and provides information, education, training, and recommendations regarding occupational safety and health. NIOSH recommends standards and best practices, but does not have regulatory or enforcement authority.

The following chart contains duration of allowable exposures of OSHA and NIOSH:

Level, in dB A	85	88	90	92	94	95	100	105	110	115
OSHA PEL	16		8			4	2	1	0.5	0.25
NIOSH REL	8	4			1		0.25			

“Duration (in hours) of allowable exposures based on OSHA and NIOSH criteria. PEL = Permissible Exposure Limit; REL = Recommended Exposure Limit. Noise exposure levels/times exceeding those shown in Figure 1 require the use of hearing protection.”

“OSHA permits exposures of 85 dBA for 16 hours per day, and uses a 5-dB time-intensity tradeoff: for every 5 dB increase in noise level, the allowable exposure time is reduced by half. For every 5 dB decrease in noise level, the allowable exposure time is doubled. All time/intensity values shown on the OSHA PEL line in Figure 1 are assumed to have equal risk to each other, that is, 16 hours at 85 dB carries the same auditory risk as 8 hours at 90 dB, 4 hours at 95 dB, 2 hours at 100 dB, and so on.”

“NIOSH recommends an exposure limit of 85 dBA for 8 hours per day, and uses a 3 dB time-intensity tradeoff: for every 3 dB increase in noise level, the allowable exposure time is reduced by half. For every 3 dB decrease in noise level, the allowable exposure time is doubled. The time/intensity values shown on the NIOSH REL line in Figure 1 are assumed to have equal risk to each other, that is, 8 hours at 85 dB carries the same auditory risk as 4 hours at 88 dB, 2 hours at 91 dB, and so on. “

“The differences in OSHA criteria and NIOSH recommendations for exposure limits produce different outcomes: the more lenient OSHA values allow for higher exposures for longer durations and the more conservative NIOSH values recommend lower exposures for shorter durations.”

The following chart presents a graphic comparison between the NIOSH and OSHA exposure limits. NIHL means noise-induced hearing loss:

The Johnson Article also contains a discussion regarding monitoring sound exposure by the use of either sound meters or sound dosimeters. In addition, there are new developments in the form of I-Phone and Android applications (that are very inexpensive) and the reading information suggests that the combination of a highly-rated "app", combined with an omni-directional microphone mounted on a stand, will provide you with an ability to measure your own sound exposure. Personally, I certainly will do so, because I do not believe, given the extraordinary amount of money expended by the Veterans' Administration for military-related hearing disabilities, that for some residences around OLFC it will take 40 years, as the Navy claims, for hearing damages to be manifested by loss of hearing. Indeed, I have lived in the same home for the last 14 years and believe that my hearing has sustained a measurable and significant loss of hearing capability. Further, I am bothered with having received no warnings that I should have been wearing protective ear coverings. I admit that I did not do so, but did not believe I was in any danger or I would have been told. Indeed, I doubt that even as to the people the Navy paid \$750,000 to, for Avigation Easements approximately 14 years ago, the Navy provided any warnings. Given the vast experience the Navy has accumulated in regard to hearing disabilities, I cannot understand the current position of the Navy regarding Civilians who live beneath FCLP flight tracks and some of us have worked 1,000's of hours in our respective backyards and gardens.

But I do believe it is up to us Civilians, at present, to both measure the actual sound level exposures in our respective yards, and to occasionally have a witness observe and take notes just in case. . . . Further, we all should wear protective ear coverings. when FCLPs are so close it hurts or is uncomfortable.

Last but not least, the Johnson article discusses the topic of "Noise Dose," and explains not only the differences in the OSHA and NIOSH standards, and indicates that the differences are most pronounced at the highest noise levels, as you can see in the charts above. She makes the point that the risk of noise-induced hearing loss is greater under the OSHA standards than under the NIOSH standards. The Navy follows the OSHA standards. My personal view is that because the NIOSH standards were adopted in 1998, after many additional studies had been conducted following adoption of lower standards by OSHA in 1983, the NIOSH standards are the standards Civilians living the noise hell that may be unilaterally imposed upon us should follow for a self- monitoring program in lieu of one that the Navy won't provide. The clincher is that the Johnson article on page 7 warns that a single exposure of 100 dB for 2 hours, which is acceptable under OSHA standards but not acceptable under NIOSH standards, resulted in "irreparable damage to IHC afferent nerve terminals and associated degeneration of the cochlear nerve." The inference is that there is little if any room for individual differences (age,

prior non-military noise exposure, and so on) under the OSHA standards and that it may well be wiser to follow the NIOSH standards.

Keep in mind that there are places near OLFC where even the Navy's projections (which are said by a private study to be inaccurate by being too low) show maximum sound exposure levels at 3 of the 4 residential POI's for OLFC with levels well over 100dB and remember that for ever 3 dB there is a noise doubling effect. Using the Navy's numbers, how many times would a Growler come over the Admirals Drive POI on an up-tempo, 5-Growler, 5-Session flying day. What would be noise exposure be if you are planting summer plants in your backyard all day long? What if the Navy's projections are wrong by 6 decibels on the low side.?

The Johnson article continues with this statement about noise dosage:

"An important point about noise dose is that it is cumulative; noise dose never decreases over time. While sound levels may go up and down over time, noise dose only increases or plateaus over time. This is because you can't remove the exposure once it has occurred, much the same way you can't undo sun exposure after the fact. When the combination of sound levels and duration exceed those shown in Figure 4, noise dose increases to values greater than 100% (see Figure 5)."

Figure 5

OSHA (1983)			NIOSH (1998)		
<i>Level (dBA)</i>	<i>Duration</i>	<i>Dose %</i>	<i>Level (dBA)</i>	<i>Duration</i>	<i>Dose%</i>
105	1	100	94	1	100
105	2	200	94	2	200
105	4	400	94	4	400
105	8	800	94	8	800
105	16	1600	94	16	1600

"A 200% noise dose is two times the allowable limit (equivalent to two days' worth of noise exposure); a 400% noise dose is four times the allowable limit (equivalent to four days' worth of noise exposure), and so on. Do exposures like this occur often enough for us to be concerned? Absolutely! Measurements taken during a drum line demonstration in the band room at a local high school, with only half of the drum line students resulted in a 1400% noise dose after only 45 minutes."

"Using dosimetry results to recommend hearing protection"

"The simplest way to use noise dosimetry results is to recommend use of hearing protection whenever noise dose exceeds 50%, particularly if that dose is reached early in the noise exposure period. Initiating protection at a 50% noise dose is more protective, especially for individuals with higher than average susceptibility to NIHL. This also recognizes the potential for exposure to noise throughout the day, rather than limiting potential exposure to the work day only."

One thing is certain, DNL contours are no substitute for actual measurements when it comes to health. With a DNL, you do not measure sound exposure. You get contours. Worse yet, DNL can be misleading. My view is the best practice is to follow the NIOSH recommendations and if exposures exceed the exposure limits, then contact the Navy by all means, but don't just stop there. Keep records. And increase record reliability by occasionally having someone witness the measurements and your record of them. Someday, they may become useful.

SECTION 9.

“NOISE ISSUES” INVOLVING GROWLER FLIGHTS

Aircraft noise is a complex subject matter that has been studied literally for several decades, and remains the primary focus of many research efforts today. Why? Because, over time “noise” generated by and emanating from planes flying overhead has achieved singularity as the largest source of civilian complaints in the realm of Aviation. So too it is on Whidbey Island, in the context of FCLP operations at OLF.

According to the Federal Aviation Administration (hereafter FAA), which governs commercial and private aviation, aircraft noise is regulated through standards that are set internationally. Under the guidance of effective efforts by the FAA over the last 40+ years, internationally accepted standards have divided noise generated by civil jet aircraft into four distinct stages or levels, with Stage 1 being the loudest and Stage 4 being the quietest. Correspondingly, Stage 2 is quieter than Stage 1, and Stage 3 is quieter than Stage 2 (See FAA Publication “Aircraft Noise Issues” www.faa.gov/about/office_org/headquarters_offices/apl/noise_emissions/airport_aircraft_noise_issues/). Currently, within the contiguous United States, civil jet aircraft over 75,000 pounds maximum take-off weight are required to meet Stage 3 or Stage 4 noises to meet noise thresholds for flying. As a result of this attempt to reduce noise, in historical terms, the order of magnitude of noise exposure reduction in the face of the gross number of private and commercial jet aircraft has dropped 90 percent from a high in 1975 to an historical low in 2012. In other words, noise exposure to the civilian population emanating from private and commercial jets was reduced by 90 percent, notwithstanding a large increase in the number of planes flying (Id.)

The experience in the realm of military aircraft is precisely the opposite of the efforts of FAA and the international aviation community. That is to say, the magnitude of noise, by any method of noise measurement resulting from military flight operations in the United States, has increased dramatically at the same time noise from commercial and private flying operations has dramatically decreased.* One reason for that result has to do with the design of particular types of military aircraft to provide more in-flight maneuverability and thrust. Noise has never been a design element for military aircraft.

* In support of my opposition to approval of the DEIS, to expand EA-18G FCLP operations at OLF, I am attaching to this document a portion of a document that analyzes the contentions of the Navy regarding noise, entitled “Outlying Field Coupeville: Its Time Has Passed,” October 16, 2016, prepared by the Technical Committee of Citizens Of Ebey’s Reserve. That attachment is hereby incorporated as a part of my document. While I do not always agree with COER, or with COER tactics, its contributions are acknowledged and appreciated. I believe their efforts have been invaluable, if not popular at NAS Whidbey, and believe they will achieve greater success in the future.

There also is a tactical benefit from having an incredibly loud and fast aircraft whenever the element of surprise is an asset (but there is no body of people in the world who get more noise from aircraft than American citizens who live beneath low-altitude FCLP flight tracks). The design criteria utilized in the development of new aircraft for the military viewed in the context of the increase of public disdain and annoyance for noisy aircraft of any type or kind, has created points of contention, social tension, dismay and anger on all sides of that issue. An experience

in Virginia involving Naval air stations and FCLPs is useful to better understand both or all sides of the issue.

As we all know, FCLP's are designed to train pilots to land aircraft safely on aircraft carriers, and are designed to closely duplicate actual landing procedures at sea. They are essential to both the safety of the Pilot and his/her Electronic Warfare Crewmate, as well as the safety of the \$90 million dollar aircraft and the Aircraft Carrier and its personnel. To best duplicate or approximate reality, it is often said by the Navy that FCLP training procedures should occur from a 600' patterned altitude. As applied to and EA-18G preparing for a carrier landing, I suspect that the plane at some point will have completed a mission at some level other than 600'. But I can see that a consistent 600' altitude might have more to do with holding to a quick or even up-tempo pace when multiple EA-18G's are engaged in FCLP's during the same session. I don't think 600' is a parametrically necessary altitude for the Growler aircraft to perform its mission and land on an aircraft carrier, as inferred by the Navy.

In any event, back to Virginia. Noise levels at both NAS Oceana and NALF Fentress caused FCLP procedures to be raised or increased to 1000 feet and 800 feet, respectively. The increase in altitude for FCLP's is said decrease an element of realism in contrast to actual landings aboard aircraft carriers at sea, but would also decrease noise exported by the aircraft to civilians and military personnel below the flight tracks used for the FCLP's (why cannot altitudes be similarly raised at OLFC?). The Navy thereafter launched an effort to identify a new remote outlying field for FCLP training at a potential cost of \$40 to \$115 million dollars, to eliminate these operational impacts (See Military Aviation and the Environment: Historical Trends and Comparison to Civil Aviation). Initially, the Navy developed plans to locate a new landing field for FCLP in Washington County, N.C., but ran into legal challenges and expanded the search to five other sites, three in Virginia, in Southampton, Surry, and Sussex counties, and two in North Carolina, in Camden and Gates Counties. That plan was later dropped to the delight of the local communities and politicians (See Association of Naval Squadron, Hampton Roads Squadron, For Now, Navy Cancels Search For outlying Landing Field, November 20, 2013).

One issue regarding using OLFC for FLCP operations is that there is very little interaction between the civilians living within the contours drawn for OLFC and the Navy community. Economic or social (See Section 3 and 4, My Comments). Thus, it is accurate to say that the civilian population that lives within the noise contours for EA-18G Growlers and their FCLP's get the noise, thereby shouldering the most unpleasant part of the Navy's insistent use of the OLFC that, originally, was designed to be nothing more than a temporary landing strip. Nothing more. Indeed, its length is significantly shorter than standard length for an EA-18G Growler, that add risk factors to the civilians homes that are within the "conceptual APZ's" (I think that term is a reference to the APZ's that exist in reality but not on paper) that apparently don't matter. Until or unless you live with noise coming from Growlers engaged in FCLPs, you simply cannot have a basis for understanding the adverse impacts. At least on most, normal people.

Here's another Navy risk factor. I guess it is a risk factor perceived by the Navy, but I won't comment upon its motives. What I am broaching, as a topic, is that now, OLFC is fortified by unsightly, unimaginative bare-concrete blocks (each approximately 3' x 3' x 6') tethered one to the next one by a steel cable and creating a "concrete-block-ring" around OLFC. There are hundreds upon hundreds of concrete blocks. As you drive down the State Highway 20, adjacent to OLFC, or along Patmore Drive, or down Keystone Hill, both also adjacent to OLFC, that concrete-block ring is the first thing Tourists and Visitors notice about OLFC. In

contrast, around much of the NAS Whidbey complex, there is a lot of fencing of hog wire with a little barbed wire, and metal stakes. With signs saying something like "Keep Out. Property of the United States." Around OLFC, someone in the Navy decided that fortification of OLFC by approximately 2,000-pound concrete blocks is necessary? The cost (maybe \$5,000,000 - \$7,000,000) of installing that ring was an essential expenditure of taxpayer money? Who does it keep out? Is OLFC in need of stronger protection than the NAS Whidbey and Ault Field? Excuse me for venting, but absent some terrorist plot, I consider the damn thing a visual in-your-face insult to my community, and I have never once been an activist, other than when I took on my kids' school district's poor performance in about 1980. And won. By fighting a PR battle. But maybe an Army of Activists, motivated by a strong sense of being wronged, disregarded, and abused, is what is needed regarding FCLP operations at OLFC. There are Alternatives (See, for example, Section 6, Alternatives for OLF Coupeville, My Comments).

Further, if you consider that noise generated as a result of FCLP's is the worst kind of noise generated on Whidbey Island, causing literal pain at times when the planes are at low altitude and directly overhead, coupled with the knowledge that Growler noise is a burden imposed upon civilians without the Navy having completed or finalized an EIS even for the predecessor aircraft to the Growler, namely, the EA6B Prowler, or the transition of the Prowler to the Growler (although drafts were prepared in 2005 and 2012, but without responding or reacting to public comments, at least publicly), a question arises. Should the Navy be entrusted with the duty to comply with Federal Law and regulations designed to among other things look out for and consider the best interests of the communities in which they are located, when making decisions regarding bringing in more noise? My personal view is that a Subcommittee of the Senate Armed Services Committee, or the Congressional Oversight Committee would be amazed at the proposals sought by the Navy to be unilaterally imposed on a civilian community (Coupeville and its Environs) having mere scant connections to the Navy. And for Coupeville, having the Tourist Element of their economy subjected to being destroyed by more noise, without any analysis of that issue in the DEIS.

The methodology chosen by the Navy to calculate noise is generally misunderstood, perhaps even by the Navy, and understates the full impact of noise on the lives of people who bear the burden of living with it. The Navy uses and defends the use of the Day-Night average sound level (known as DNL) and declares that it is the federal standard for determining community noise impacts. The Navy explains that the DNL is used to determine long-term community noise and land-use compatibility and that it is a 24-hour cumulative noise metric. They don't tell you that they could but choose not to exclude any quiet hours from calculating that 24-hour metric. By using the entire 24-hour period, the noise that generates public complaints and health concerns is diminished and the health threats are, accordingly, understated. Consider, if you will, two aspects of the Navy's noise calculations. The Navy includes the "quiet time" of the night as well as the "noise" from the days when FCLP's are NOT performed (that would be zero Growler noise for those times and days) in reaching their very diluted DNL. Consider how much no-Growler-noise-at-all time a 24-hour, 365 day per year, metric includes. Averaging 45 FCLP-flying days into 365 day year includes 12% of the year days involving Growler flights and 88% of the year when they are not flying. It isn't the 88% that causes hearing losses, it is the 12%, but the actual noise exposure is hidden from view. But not from our ears. Thus, individual noise events should be expected to be significantly louder than 60 dB during FCLP operations. But, remember that by referring to the 60 dB contour line, it makes it possible to say that living in a 60 dB contour is not so bad. However, in contrast, living below a Growler flying at less than 500' and at under 200 knots of airspeed into a head wind and completing a left-turn directly overhead can be the closest thing to a noise hell that exists on this Earth. It truly is unworldly. It is the loudest exposure of any flying aircraft. It is intolerable. To me, I hear a Navy

voice that is saying "enjoy it and if you can't, get in your car and leave your property until we are finished. We don't care." The private contractor the Navy hired to assist in preparing the DEIS has stated "Potential Hearing Loss (PHL) applies to people living long-term (40 or more years) outdoors in high noise environments (Wyle Laboratories, Draft WR 16-02, Aircraft Noise Study for NAS Whidbey Island Complex, Washington, Page A-23 and repeated elsewhere).

For predicting levels of "community annoyance" around airports, the 24-hour average DNL is useful, especially around commercial airports. In commercial airports scenarios, the 24-hour average DNL has been said to be very relevant primarily because commercial airports generally operate much of a 24-hour day and 7 days per week and 365 days per year. For measuring FCLP operations, it becomes bastardized because of the "intermittent" aspects of FCLP operations. FCLP operations are not conducted 7- days per week and are not anywhere close to being conducted 365 days per year. The 24-hour average DNL in essence does not reflect that FCLP operations have more zero days than days when there are any flights. But if you wish to minimize actual burdens of noise, what better way is there than to use the same procedures utilized for commercial airports. Unless you don't want to be disingenuous. Lastly, let me just point out that in many situations, DNL averages are calculated using only "busy days." But doing so for OLFC FCLP operations would present an average that would reflect reality.

The essential thing to understand in the context of the DEIS, is that DNL numbers do not tell the real impact. When a Growler comes thundering at 400 feet above your backyard, your noise exposure is high enough for Growler Pilots not to live anywhere near your home. Did the Navy tell you not to live where you live? But if you do, what is your noise exposure when a Growler is overhead, and how long is the duration of its dominating presence in your backyard. And it has been happening about 3,050 times each year. Do you really understand that the Navy is willing to increase their presence in the form of a Growler in your backyard by 575 percent. A 575 percent increase of 3,050 is about 17,550. Right now, the Navy claims there are about 45 FCLP operations flying days per year. That would mean a per flying day average currently of 68. If you (we) are subjected to 17,550 FCLP operations over 45 flying days, that would increase the per day average to 390 if you only get half the Touches or half the Go's. If you get all the noise all the time, as is the case with Race Lagoon at OLFC, you get a longer duration of noise for each FCLP, one of the factors that should enter into the DNL calculation for Race Lagoon residents, but apparently is not. Also, if there is other than a 50-50% split in the planned use of Runways 14 and 32, the numbers would be affected by the actual split. Moreover, the other flights that create enormous amounts of noise, including arrivals and departures related to FCLP operations as well as arrivals and departure related to Ault Field operations which involve real-life flights directly over or near OLFC at all sorts of altitudes, would increase the real-life DNL numbers for the vicinity surrounding OLFC.

In an article written by an employee of Wyle Laboratories, hired by the Navy to perform the noise calculations included in the DEIS, [REDACTED] states that "the use of the Day/Night Average Noise Level (DNL) metric system alone is questioned as being a flawed system for explaining noise exposure to the average citizen," and that "this confusion leads to mistrust and the conclusion that DNL underestimates the noise that many citizens experience." For example in 2009, an outdoor rock concert held at the Virginia Beach Amphitheater was disrupted roughly every five minutes by deafening jet noise. The jet noise was so loud at times that the concert goers complained of not being able to hear the concert. It was reported that even the band was annoyed by the noise. Noise levels by a rock band can reach a range of dB levels from 108 to 114 dB (Federal Inter-Agency Review of Selected Airport Noise Analysis Issues, Table B.1, Federal Inter-Agency Committee on Noise (August 1992). The Virginia Beach Amphitheater is

located within the 65 dB DNL noise zone approximately 5 miles from Oceana NAS. Even though the 24-hour average noise level is 65 dB, the individual noise events that occurred during the concert as jets flew over was likely higher. High enough to blot out the noise or music of the rock band.

The Navy does, in fact, in its recent brochure announcing the public meeting for the EIS, broach the subject of Sound Exposure Level (SEL), by declaring that it represents "the total noise energy of a single event, such as a flyover, as if it occurred in one second." Then a 30 second SEL is chart is shown. The Navy also provides charts showing in actual decibels (dB's), how loud some familiar items are, such as hair dryers, vacuum cleaners, automobiles, jackhammers, lawn mowers, and numerous other items. It is always a bit of a surprise to see that even a conversation isn't that far in DNL terms from Growler noise engaged in FCLP operations. My point is that if you compare in decibels familiar items with Growler noise, measured in DNL's there isn't much difference. The real difference, however, is beyond even the noise from a rock concert, as indicated above.

To now present a draft EIS of a plan to increase the noise levels by increasing the number of FCLP operations from the current 6,100 to some other number as high as 35,100 is absurd and unacceptable. So too it should be unacceptable to Congress, if not to any level of command within the Navy. I have included at the end of this Comment a one page document (although it is undated and not fully attributed to an author, it appears to be a legitimate Navy document, and is available for perusal at www.nrac.navy.mil/docs/2009_exec_summary.pdf). Its value for my purposes is that it points out reality in the context of a lack of effort by the Navy to accumulate noise data, the need to consider noise from an engineering focus, the fact that Navy noise is a growing health issue, that there is a need for developing better procedures to monitor noise exposure, to further develop noise abatement procedures to minimize the noise footprint around Naval Air Stations and to more fully research physiological effects of the full spectrum of noise - including low frequency pressure levels, on humans. To me, the Executive Summary reflects the policy that the Navy should deal more with reality than with fiction or ignoring reality as it relates to continuing FCLP operations at OLFC.

If the Navy wants or continues to insist that they want an OLFC where they can perform 35,100 FCLP's, or more, as by providing training to pilots from other countries (Australia has purchased Growlers and Aussie pilots need training, for example, or if they want to purchase more and more EA18G Growlers and move them to Whidbey Island), they should act responsibly as they attempted in Virginia, to find a location elsewhere that will not subject civilians to unbearable and totally absurd and unacceptable noise events.

In preparing to write my comments in response to the request for public comments regarding the DEIS and its 10 proposals, I took a close look at a document prepared by the Naval Audit Service in its Interim Audit Report in Consideration of Hazardous Noise in the Acquisition of the EA-18G Growler, prepared 10-31-2008, (N2009-0008). In that document it is a bit stunning that so little was done in regard to considering the risk of hearing loss upon anyone, much less Civilian Communities subjected to FCLP noise. That was simply never an issue, although there were alarm bells ringing loudly in the minds of those conducting the audit that both Navy and DoD policies had not been fully met. But then again, maybe that's par for this course.

Lastly, while it isn't my place to question the Navy's wisdom of placing all Growlers of the United States at any single NAS, my instincts may be affected by the knowledge of Pearl Harbor and reading and learning about how very few U.S. aircraft were able to be used to engage the enemy on that infamous day we all remember so well. Ault Field is not even in a harbor,

although it is on the coastline. I don't even know whether its fortifications are as good as those undertaken at OLFC. But what if some Growlers are needed immediately for legitimate reasons in Florida, or Maryland or Delaware, having nothing to do with Aircraft Carriers? All I know is that I have lost confidence in the Navy's wisdom in making decisions, primarily because of its intransigence respecting OLFC and Coupeville and its Environs; and the manner in which it has avoided or ignored the mandates in NEPA, that prefer peaceful coexistence and cooperation instead of "what we got".

SECTION 10.

GROWLER NOISE LEVELS: IMPACT ON HEARING HEALTH

Among the documents included on the website of the Federal Aviation Administration, is a document entitled "Hearing and Noise in Aviation." In that document, the term sound is used to describe the mechanical radiant energy that is transmitted by longitudinal pressure waves in a medium, and that sound waves are variations in air pressures above or below ambient pressure. It then states that the term "sound" describes "the sensation perceived by the sense of hearing" and that all sounds have three distinct variables: frequency, intensity, and duration." The article defines each of those as follows:

"Frequency. This is the physical property of sound that gives it pitch. Since sound energy propagates in a wave-form, it can be measured in terms of wave oscillations or wave cycles per second, known as hertz."

"Intensity. The correlation between sound intensity and loudness. The decibel (dB) is the unit used to measure intensity. The range of normal hearing sensitivity of the human ear is between -10 to +25 dB. Sounds below -10dB are generally imperceptible. [Any person] who cannot hear a sound unless its intensity is higher than 25 dB (at any frequency) is already experiencing hearing loss."

"Duration. Determines the quality of the perception and discrimination of a sound, as well as the potential risk of hearing impairment when exposed to high intensity sounds. The adverse consequences of a short-duration exposure to a loud sound can be as bad as a long-duration exposure to a less intense sound. Therefore, the potential for causing hearing damage is determined not only by the duration of a sound but also by its intensity."

The FAA Article also distinguishes between types of noise and categorizes those as "steady" or "impulse/blast" noise. It describes "steady noise" as "continuous noise of a sudden or gradual onset and long duration (more than 1 second)" and provides examples to include aircraft power plant noise, propeller noise and pressurization system noise" and quotes the Occupational Safety and Health Administration (OSHA) as having determined that the maximum permissible continuous exposure level to steady noise, set forth in a sliding scale, is 90 dB for 8 hours down to a limit of ½ hour for noise intensity of 110 dB per hour, or ¼ hour per day for noise intensity of 115dB (See also, Section 8 - DNL, NIOSH & OSHA, My Comments, regarding lower level noise exposure recommendations by NIOSH). Then it describes examples of impulse noise to include noise from firing a handgun or being in proximity to jet engine noise. Finally, it

warns that if the ambient noise level reaches 90 dBA, you must use hearing protection equipment to prevent impairment (I note that at Sullivan Road the diluted DNL is said by the Navy to be 90 dB DNL, which averages into that calculation both non-flying days and quiet times, and I wonder whether the Navy has publicly warned people who live in that vicinity).

The Internet also reveals the existence of a document entitled "Community Aircraft Noise: A Public Health Issue, prepared by Karen Bowman, MN, RN, COHN-S, of Karen Bowman & Associates, a Seattle-based Environmental Health Specialist who has an Advanced Practice Degree in Community Health Systems and works closely with the Department of Occupational Safety and Health. She is a Professor at the University of Washington in the area of Hearing Health. A copy of that informative report is attached at the end of this Section. The article provides an overview of environmental noise exposure as a public health issue, discusses noise and the anatomy and physiology of the ear and of hearing, indicates how noise exposure is measured and mitigated, as well as noting the health effects of excessive noise exposure including hearing loss, psychosocial impacts of noise exposure, the relationship between noise, stress hormones and health, the interrelationship between noise and immune disturbances, and the interrelationship between aircraft noise and health.

At a minimum, the Bowman Report draws into serious question both the methodology and findings prepared for inclusion in the DEIS regarding noise and its effects on health and education, and serves as a clarion call for the Navy to move into the 21st century in giving appropriate regard to the hearing health of civilians who live below the onslaught of noise imposed by Growler overflights and FCLP's.

The DEIS includes in Appendix A, at page A-52, a Table 5-5 that is entitled "Estimated Aircraft DNL at POI for the Average year No-Action Alternative." I was unable to find a parallel estimate for any of the 9 other possible Navy choices proposed and analyzed in the DEIS. That search included searching the Table of Contents which lists all the Charts, figures and tables prepared for inclusion in the DEIS. I would think that, for example, increasing the number of FCLP's at OLFC from 6,100 to 35,100 might have an impact on the average DNL for the OLFC POI's. If not, that is merely further evidence that the 24-hour 365 day per year average may be little more than a hoax, in the context of assessing whether Growler noise is a threat to the hearing of those citizens who live under FCLP flight paths. Moreover, there are no documents included in the DEIS indicating for various flying days, or up-tempo flying days, the expected levels of total noise exposure at any of the OLFC POI's (there should be far more than a mere 4 POI's for residences near OLFC, in view of as much as a 575% increase in the number of FCLP operation increases).

I would like to draw your attention to the residential portion and the school portion of Table 5-5. The respective DNL "estimates" for Admirals Drive is 79, for Race Lagoon is 61, and for Coupeville Elementary School is 59. If you are not familiar with the location of those places, called POI's for purposes of the DEIS, let me assist you in understanding the geographical relationships between those three locations. When OLFC Runway 32 is used for FCLP operations, Admirals Drive is located at the landing end of the Runway, and close to being directly below the loudest part of an FCLP "touch down." Race Lagoon will receive noise regardless of whether Runway 32 or 14 is used (those are the only runways at the landing strip that is OLFC. It generally lies to the east of both runways, but receives the noise when runway 14 is used because it also is not only east of the runways, it is a bit north of the center spot of the landing strip that is FCLP and would receive a lot of noise associated with "Go" thrust in addition to the "Touch" wheels-down powered landing noise. The Race Lagoon POI is directly below downwind legs of FCLP operations involving Runway 14 at OLFC. To the extent Race

Lagoon is situated to the side of the landing strip, it likely does not receive the maximum noise associated with either the powered landing "Touch" approach or the "Go" take off thrust of an EA-18G Growler. The Coupeville Elementary School lies approximately 3 miles from the center spot of the landing strip that is FCLP and will receive noise primarily after the take off from Runway 32 as the aircraft executes a left hand turn and begins the downwind legs of FCLP's involving Runway 32 at OLFC, preliminary to executing an approach procedure to execute the next touch. It likely involves noise generated by a Growler cruising at 400 to 600 feet.

To me, the "estimated" numbers are highly suspect in terms of a comparison with reality. If you compare the estimated computer-generated modeling numbers for Admirals Drive and Race Lagoon, there is a significant and substantial difference between 79 and 61 dB DNL. If 3 dB is equal to a doubling of sound comparing 100 dB to 103 dB, you do the math for a 5-fold increase projected by table 5-5. To me, those two numbers are statistically improbable in reality. Further, the numbers for Coupeville Elementary School and Race Lagoon are improbably too close to each other, given their respective proximity to their respective proximity to Growlers engaged in FCLP operations. More specifically, Race Lagoon is much closer in proximity to a Growler at either the touch segment or the take off segment of a FCLP operation than the Coupeville Elementary School. There is said to be only a 2 dB difference in estimated noise, based on the Navy's chosen methodology. Further, because Race Lagoon would receive Growler noise when FCLP operations utilize Runway 14 and when Runway 32 is used, it is likely that the DNL of 61, compared to the 79 for Admirals Drive, is understated substantially. Moreover, comparing Race Lagoon with Sullivan Road near Ault Field, to me is suspicious, unless the difference is based primarily on distance from the runway. In any event there is an enormous difference between 90 DNL for Sullivan Road and 61 for Race Lagoon. Do the math to see how much louder is Sullivan Road than Race Lagoon. I also note that, similar to the proximity of Sullivan Road, Keystone Hill Road is parallel to the Runways at OLFC. I further point out that no POI was selected for the entire roughly 4-5 miles of coastline between Race Lagoon and the City of Coupeville. That area receives high levels of noise because many arrivals and departures from Ault Field and not involving OLFC, arrivals and departures before and after FCLP closed loops at OLFC, as well as FCLP's at the point of the final descent when Runway 14 is used and the left turn prior to the beginning of the downwind legs when Runway 32 is used. I guess we must use our own meters to determine noise exposure doses.

Additional comparisons for many of the POI selections also build into the data numbers that are equally suspect and improbable in the real world.

In addition, there are examples of the Navy's own words that belie reality and support the conclusion that the Navy is disingenuous in presenting a fair and balanced record regarding noise. In the DEIS, the Navy declares that Growler flights, at a higher than FCLP altitude, ranging from 6,000 feet to 16,000 feet, would generate noise at ground level between 69 and 84 dB "comparable to the sound level of a passing automobile." While there are studies that place the dB of a passing car in the vicinity of 65 to 76 dB, let us remember that the context in which we are assessing is as to noise in the context of NAS Whidbey and residences surrounding OLFC. A Purdue University Study of Noise Sources and Their Effects (See chem.purdue.edu), characterizes a passenger car at 65 mph from a distance of 25 feet as having a dB level of 77; on the freeway at 50 feet from pavement edge at 76, and measured living room music at 76 dB and a vacuum cleaner at 70 dB. But the notion that Growler noise of between 69 dB and 89 dB is similar in quality to noise of a passing car does not reflect the intensity, frequency, or length of the sound waves produced by a Growler at 6,000 to 16,000 feet, especially if the Growlers are in groups or formations of two or more (often is three flying from NAS Whidbey). The length of even a single Growler at 6,000 or so feet will last 20 or more

seconds, while noise from a car driving by my home on a public street might last 2 seconds. The Navy's comparison is a typical and common effort apparently to understate all noise generated freely by Growlers flying at OLFC.

It should be noted that my comments include statements regarding the flights in and out of NAS Whidbey that occur directly overhead, as viewed from my home. They could be flown under Whidbey Approach Controller direction primarily over water, but instead more often than not are directed from a point near Dugualla Bay to a point between Snakelum Point and Long Point in a southerly or southwesterly route directly over the OLFC. Why the Navy uses this flight direction, in view of the burden of FCLP's conducted from OLFC seems more like spite than anything. Flights continuing over the Saratoga Passageway would impose noise upon far fewer people than upon those that already are imposed upon to the max. The Navy M.O. seems to be to fly over OLFC whenever possible. And in the case of my home, maybe even it hit with some Electronic Warfare (see Section 5, Electronic Warfare Against one Civilian? My Comments).

Moreover, it is elementary that hearing losses are not potential losses in and around OLFC even under the existing and currently used program that anticipates a maximum of 6,100 FCLP operations per year. Hearing losses already have occurred. I, for example, am but one of many who are ready, willing, and able to submit to any objectively conducted hearing tests and you will then better understand that I have lost substantial hearing capacity and ability in the 14 years I have lived below noise generated by Prowlers and Growlers. It didn't take 40 years for that to occur. Moreover, it is noted that attention presently is given by the Navy for its "own people," but not including civilians whose only relationship with the Navy is that of living below FCLP flights and operations.

The Navy's DEIS concludes that the values presented in those tables are only applicable in the extreme case of outdoor exposure at ones residence to all aircraft events occurring over a period of 40 years and that it is highly unlikely any individual would meet all of the criteria necessary to establish a hearing loss attributable to Growler noise. That statement is highly suspect in terms of validity and likely will lead to at least two consequences: (a) a Navy finding of "no significant impact" of any of the proposals contained in the DEIS, and (b) a continuation of an Official Policy of an Agency of the United States of America that denies any relationship between Growler noise and the hearing health of fellow Americans who are subjected to that noise. The Navy's modeling calculations are debunked not only by hearing loss in real people and by numerous studies based on fact rather than the computer-generated models created somewhere in an office rather than in the real world, and in part based upon "data" that is provided by the Navy to Wyle Laboratories and must involve secrets because it isn't put before the public although it involves public health..

One of the issues in this arena is as to cost. It is difficult if not impossible for the general public to finance and repeatedly conduct long-term testing to provide needed data to provide decisive, accurate information. And the Navy seems entirely satisfied nationally to continue to ignore reality and instead to rely upon computer modeling that reaches results seemingly always favorable to the Navy's Three Mice M.O, regarding hearing, seeing, and doing.

Table 5-6, at page A-53 of Appendix A, DEIS, is entitled "Estimated Potential Hearing Loss for the Average Year No Action Alternative and Table 6-8a, at page 77, is entitled "Estimated potential Hearing Loss for the Average Year Alternative 1A. Those figures are based upon computer modeling and the Navy has not revealed any studies based upon data collected during actual FCLP operations when pilots are unaware that studies are being conducted.

Thus, neither the computer models nor their conclusions have been validated by factual data collected in an objective manner.

Regardless of conclusions reached, based upon a computer modeling program, there exist real-life adverse impacts upon real people that are absent from acknowledgement in the DEIS but are not absent in reality. Further, there is an existing program of FCLP operations that could be studied, and many of us are reasonable people who have deep-seated, life-long love of country who also love Whidbey Island, and willingly would assist the Navy in the conduct of a real-life, fact-based study of that existing program. There is a tremendous conflict between being able to live a good life on Whidbey Island and the conduct of any FCLP operations anywhere on Whidbey Island, but especially upon the people who live in the vicinity of OLFC and who have virtually no interrelationship with NAS Whidbey. That conflict is proposed by the DEIS to continue to be ignored in favor of increasing the episodes of noise terror from 6,100 operations per year to as many as 35,100 annual FLCP operations, which represents a multiplication factor of between 5 and 6. In my opinion that would be unconscionable. It is unbelievable, and it is frightening that this kind of behavior by an instrumentality of government could happen in America, especially when it is absolutely clear there are other areas and locations in the western United States that would both facilitate keeping all the aircraft at NAS Whidbey, and provide an alternative FCLP landing strip where NO civilians would be subjected to the worst noise imaginable for a non-military neighborhood or vicinity. That should be the goal of the Navy and of every resident of Whidbey Island who sees Whidbey as their permanent, long-term domicile rather than a temporary, short-term place of residence that often is different from their domicile.

The Navy often is quoted as saying that OLFC is the "best location" and "is designed to provide the most realistic training" for FCLP's. Neither is true if interests other than the Navy interests are a consideration. It also is made in the vacuum of never considering that there are other locations that would be better than OLFC. Also, the Navy's intransigent position flies in the face of their mantra that they "want a dialog" with members of the community and that they "want to be a good neighbor." In fact, the OLFC is nothing more than a bare bones landing strip (plus an approach radar set and a couple of bare bones buildings) that has no permanent personnel assigned to it and could be duplicated and improved upon by a replacement landing strip built elsewhere. For example, a new runway could be a longer runway more suitable for landing EA-18G's rather than the "short" 5,400 strip at OLFC, thereby eliminating the risk to Civilians who live in the Navy's self-described "conceptual" Accident Protection Zones. The Navy presently has EA-18Gs fly to other locations in both Washington and Oregon for the conduct of several other forms of training, including in the Navy's own words "Growler aircraft that are transiting from Ault Field . . .to nearby military training areas (Olympic, Okanogan, Roosevelt, and NWSTF Boardman, for Electronic Warfare Training, Low level military flying tactics, and utilizing weaponry aboard a fully loaded ready-for-action Growlers. ." It would not constitute a large or long step to remove FCLP training from Whidbey Island. Thus, there exists several levels of precedents for training EA-18G pilots and crew other than at OLFC or NAS Whidbey.

Further, the cost of a selected new landing strip or two landing strips is relatively slight on a national scale but would have tremendous benefit both to NAS Whidbey and OLFC by ridding Island County of the extreme burden involuntarily imposed and proposed to be increased by intolerable and totally unacceptable levels that would devastate the civilian population who live in the vicinity of OLFC and would impose warlike levels of noise upon civilians who get no benefits from having the Navy as a community member. The time has come for the Navy to get real and work to resolve the OLFC burden and issues by finding a different site and location

upon which FCLP operations could be performed without burdening any civilians or military personnel.

If the Navy really loves OLFC, why have they never sought to make it a permanent part of NAS Whidbey, and build some housing onsite at the OLFC for Navy personnel like Growler Pilots and their families and Crew. The obvious answer is they likely would have a mutiny because of the obvious and numerous issues associated with living anywhere close to a facility that conducts FCLP operations.

One last bit of news as I close this Section. In 2013 and 2014, the United States Navy decided to expand its NAS Key West training program to include 52,000 FCLP operations for the F/A-18E/F aircraft in Florida. In response, a retired Officer with 25-years of service service in the United States Navy, on January 21, 2014, referred to the Federal Bureau of Investigation (FBI) an allegation that a 2003 Environmental Assessment for Fleet Support (EA) prepared and submitted by the Navy was in violation of 18 U.S. Code Section 1001, as well as other federal laws, by knowingly and willfully making materially false statements. The EA had reached a finding, expressed in a Navy Record of Decision (ROD), of "No Significant Impact." (See The Blue Paper, The Key West Newspaper, Navy Jet Noise: Hammerstrom Calls in the FBI).

SECTION 11.

VIBRATIONS AND CONCUSSIVE SOUND WAVES: EFFECTS OF THOUSANDS OF REPEATED EA-18G "GROWLER" FLIGHTS ON THE BLUFFS OF WHIDBEY ISLAND

It is well known that there are seismic fault lines that run through, under, or near Whidbey Island. In addition, a visit to the available earthquake monitoring/reporting websites reveals a history of earthquakes in the vicinity of Whidbey Island. Further, many small, some medium, and a few relatively large landslides have involved the various bluffs of Whidbey Island. In the past few years, one medium slide occurred approximately 600 feet to the west of my property, taking approximately 600 - 900 cubic yards of glacial till from about 10 feet down from the edge of the bluff all the way to the water line, along with two dozen or so uprooted, mature trees. The width of that slide was approximately 100 feet. This past year a small slide occurred precisely on Kineth Point destroying the use of approximately 30 - 50 cubic yards of glacial till material. The point to be taken here is that the coastal bluffs of Whidbey Island are comparatively fragile and in danger of being damaged or destroyed, and should be protected from abuse by any person or entity, including the Navy. Effectively, all of the coastline of Whidbey Island is owned by the Federal, State or Local Government, or by private parties like myself. To me, it is quite valuable and treasured. In other parts of the United States where FCLPs are performed, including Florida where F-18s engage in FCLP operations, there are no bluffs at low level approaches to landing strips.

Prior to purchasing the lot upon which my home was constructed in 2002, I secured the study of a Geologist regarding the stability of the bluff that is on the waterfront. The Geologist concluded that there was "no significant geologic hazard exists at the subject undeveloped lot." He further stated that "[t]he extremely steep coastal bluff segments southwesterly of Long Point and southeasterly of Snakelum Point have been the erosional feeder bluffs for deposition of the respective cusped spits or "points", during the past several thousand years. The steep bluff of glacial till, from 50 to 100 feet high, below the Kineth point Woods subdivision is a minor feeder bluff that contributes to gravelly sediments on Rodena Beach, a pocket beach with relatively little erosion of the low coastal bluff below (my lot). . . . That situation augurs well for minimal bluff erosion along the northerly edge of (my lot)." He later quantified for me the average annual erosion to be expected on the bluff that fronts on my property, as being one-half inch per year.

My acre-sized Garden is one of the finer ones on Whidbey, and often is sought by others for us to be the host for a garden tour. Last year, we hosted the Whidbey Island Garden Tour (a 100% charity fundraiser) attended by about 650 people over a 6-hour viewing window, as well as several other smaller tours. We have hosted an average of 4-5 tours over the past 10 years, including several from Canada and other parts of the

United States. We have spent thousands of hours working in the Garden notwithstanding the extreme noise and nuisance imposed upon us by the Navy. It is during that large part of time, working in the garden, (working without the benefit of a Navy warning to wear ear protection, primarily because of Navy assurances that there was no need to do so) that gives us a high degree of experience feeling the concussive effect of the sound waves and vibrations, generated by both Prowlers and Growlers. It is our position that the Growlers generate a substantially greater degree of vibrations and concussive sensations. Recent research tends to verify that fact by recognizing that the Growlers' engines generate a more powerful, lower-frequency sound wave than the Prowlers.

The Navy, in its latest DEIS, recognizes that fact and discusses it in the context of structures at NAS Whidbey, Indian Burial Grounds, and other historic sites, but does not discuss or even mention the Coast Line and high bluffs that in essence surround much of Whidbey Island.

It is my belief and opinion that there is a **cumulative effect of frequent Growler flights, especially at levels below 600 feet, as is common with FCLP operations at both NAS Whidbey and OLFC, upon the relatively fragile bluffs of Whidbey Island, and that it is gross negligence for the Navy to continue to ignore the potential for danger of contributing to more and more landslides.** Who can say with scientific certainty that the large landslide that occurred on the west side of Whidbey Island about 5 years ago (about the time Growlers were beginning to arrive at NAS Whidbey), was NOT in part due to Growler-generated vibrations and sound waves?

The DEIS, prepared by the Navy, does not discuss, scientifically, with the assistance of credible geologists and others with landslide expertise, and without a Navy bias, the present and future impact of vibrations and concussive aspects of sound waves generated and distributed by any EA-18G flights. Neither does it discuss the likelihood that up to 36,100 flights at low levels over the relatively fragile coastline of Whidbey Island as contemplated by the No Action Alternative or by Scenario A, B, or C of Alternative 1, 2, or 3 in the DEIS, might or could or definitely will have an adverse impact on the coastline of Whidbey Island.

While the DEIS does contain an acknowledgement that architectural resources "within NAS Whidbey" and its immediate surroundings may be impacted by noise and vibration from the operation of Growler aircraft (DEIS, pages 4-193-195), it quickly concludes that damage would not be expected because sound levels do not reach a weighted 130 dB level. **There is no attempt to provide credible documentation as to whether there is the likelihood of a cumulative factor in weighing the possibility of a noise or sound induced landslide, or whether a lower threshold than 130 dB would or could not trigger a destructive landslide on Whidbey Island, especially where there exists and has existed long before the arrival of the Navy on Whidbey Island fractures and fissures from prior times.**

Once there is a landslide, there is no possibility of a repair. The Coastline of Whidbey Island is relatively unique. As such, it should be guarded and protected, not ignored. Most of the houses built on Whidbey's bluffs were built with a government-issued building permit and were completed and inhabited long before the arrival of Growlers with their low-frequency noise generating engines. It is time for the Navy to engage in meaningful study of this issue. If it is the Navy's position that they would prefer to destroy the coastline of Whidbey Island, then maybe it is time for the Navy to simply buy miles of shoreline properties and raze all structures. At least, then the Navy could have ownership of ingress and egress avenues at any level. It may well be an abuse of power for the Navy to continue to engage in Growler activities that may well destroy privately-owned waterfront lands of Whidbey. Especially considering that there are many reasonable alternatives to conducting FCLP operations at OLFC (see Sec. 6, Alternatives to OLFC, My Comments).

SECTION 12.**HEARING HEALTH ISSUES AND GROWLERS, UNTIL F-35'S ARRIVE**

“The mission of the Navy is to maintain, train and equip combat-ready Naval forces capable of winning wars, deterring aggression and maintaining freedom of the seas.” [navy.Mil.com](http://navy.mil.com)). In more detail, the Secretary of Defense sets forth the Primary Missions of the U.S. Armed Forces at the website (archive.defense.gov/news/Defense_Strategic_Guidance.pdf). Neither statement mentions interactions with between Navy's leaders and American Civilians who happen to live in the vicinity in which Naval training occurs. However, it is clear that the Navy's authority is limited, restricted, and subject to the rights and obligations of every American set forth in the Constitution of the United States and in hundreds of Federal Laws. NEPA is one of those laws. It was enacted in the full day (or glare) of both the Constitution and other laws.

It is my personal opinion that the Navy, as fine an organization as it is, and as critical as it is to the safety and security of the United States, indeed much of the World, sometimes focuses more attention to its mission as a Branch of the Armed Forces of the United States to the exclusion of its limitations and obligations set forth in both the Constitution and in various laws, including NEPA (See, for example, Section 1, My Comments). My purpose here is not to focus on the excesses of the exercise of Naval Power, rather it is to emphasize the impacts the Navy is having on the hearing health of actual real live American Citizens, and the impacts it is threatening unilaterally to impose upon some of the people who live in the vicinity of OLFC.

Initially, I concede that it is absolutely impossible to persuade any Officer of the United States Navy, except privately, that the Navy in the past is guilty of excesses in exercising its considerable power as it relates to Citizens who happen to live in the vicinity of OLFC. I am aware of what happens to Officers who do not adhere to enforcing a decision made up the chain of command. I sincerely doubt that any Officer assigned to NAS Whidbey has authority to, or wants to change a significant decision made at a higher level of Command. I recall an incident in my own Air Force career of six years. While I had a very fine record, including being offered (and accepted) a Regular Commission upon graduating quite high in my OTS Class, heading a maintenance and operations squadron at Cross City, Florida, that in the 15 months following my assignment to that unit, went from 117th of 119 identical or similar units within the North American Air Defense Command to First of 119 with the same senior NCO staff in place when I arrived (and received a Commendation Medal for my success), was selected for Special Career Monitoring (Top 2% of officers, as rated). While at a remote assignment in my last year (I had been extended one year at the time I submitted my letter of resignation), I was a lowly Captain, in charge of maintaining the various pieces of equipment for an AC&W Squadron and received a package (a copy of which went to about 10 Officers in other locations and of higher ranks than mine, up to the Commander of the Pacific Air Force. The package was in regard to the installation of an additional height-finder radar. The one we had was used only about 25% of its capabilities. I didn't think we needed to spend money for another, so in my comments, solicited of all people who received copies of the package, I spoke the truth, and included a political statement, about the future use of the planned installation. A few days later, I began to receive phone calls from the three officers immediately above me. They were basically one-sided conversations. Six months later, just before installation was planned to commence, the installation project was canceled, but my phone remained silent.

My point here is that it is necessary, sometimes, to provide information that may seem at odds with prior decisions. However, how can a decision that is at odds with new evidence or with reality be modified or revised, or scrapped, if someone doesn't take the lead and provide that information. You can't force someone to read new information, but you can nonetheless provide the information without endangering your career. But not always, I understand.

I also understand that the manifestation of the effects of excessive exposure to noise may be delayed by a period of time. Even decades. But hearing losses of people exposed to Navy Aircraft noise are a reality today. At one time long ago, hearing protection devices were not a part of the Navy's uniform-of-the-day. Things changed, but Billions of Dollars are being spent by American Taxpayers for disability benefits for Navy personnel. And warnings abound for Navy workplaces having very high levels of noise exposure, in terms of intensity and duration.

Further, in reality there is no worse levels of, or exposure to, noise for citizens who have no direct relationship with the Navy, than the noise associated with a continuous stream of F-18E/F's or EA-18G's flying FCLP's. For people living below the flight paths and near the landing strip or runway for the incumbent Touches and Go's, the noise is disruptive, intrusive, unwelcome and dangerous. I believe strongly that there exists sufficient medical and Navy-generated information to cause a reasonable person to want to know and understand the actual noise levels to which citizens who live near OLFC are subjected to involuntarily. Continued Navy denial of the existence of actual levels of noise that endanger the future hearing of many of us, viewed in the light of the burgeoning mountain of evidence that high levels of noise are dangerous, could become a stain on the Navy's reputation. I do not believe continued reliance on the mantra that projected noise contours drawn by or in accordance with NOISEMAP projections that have never been verified (or ever publicly acknowledged as having been verified) is acceptable. The Citizens whose hearing is an issue deserve better. The Navy obligations in this regard are clear, under NEPA and the Constitution of the United States, to which the Navy is subject.

SECTION 13.

GROWLER NOISE AND COMMUNITY HEALTH

The DEIS, in the context of considering the distinct possibility, indeed probability, that Growler Noise, including existing single noise events as well as the cumulative impact of noise exposure from frequent Growler FCLP operations, coupled with primarily Growler noise from overflights of Aircraft engaged in flying to scheduled activities elsewhere or returning to NAS Whidbey where the flight tracks of those overflights are directly over the OLFC, is a contributing factor to the health of the civilian population that lives below is little more than an embarrassment of gobbledegook. It is nothing more than a whitewash seemingly designed to facilitate reaching a decision of "No Significant Impact" for whichever proposal is selected and imposed by the Navy.

For each of the Alternatives proposed by the DEIS, a single paragraph is devoted to the "Nonauditory Health Effects." Let me quote the paragraph attendant to Alternative 1, and you need not refer to the paragraph for the other Alternatives. It reads the same except the "1" is replaced by a "2" or a "3":

"Nonauditory Health Effects"

"Per studies noted and evaluated in Section 3.2.3 [entitled "Noise Effects"], the data and research are **inconclusive** with respect to the linkage between potential nonauditory health effects of aircraft noise exposure. As outlined within the analysis of DNL contours and supplemental metrics presented within this section, the data show that the Proposed Action would result in both an increase in the number of people exposed to noise as well as those individuals exposed to higher levels of noise. However, research conducted to date has **not made a definitive connection** between intermittent military aircraft noise and nonauditory health effects. The results of most cited studies are **inconclusive and cannot identify a causal link** between aircraft noise exposure and the various type of nonauditory health effects that were studied, **An individual's health is greatly influenced by many factors known to cause health issues, such as hereditary factors, medical history, and life style choices regarding smoking, diet, and exercise. Research has demonstrated that these factors have a larger and more direct effect on a person's health than aircraft noise.**"

That is an unbelievable statement coming from an entity of government charged with protecting our homeland and its citizens, including civilians who live in the vicinity of Coupeville, indeed who live on Whidbey Island, not to mention military personnel and their families. It reads in contradistinction to the experiences of military personnel who have sought and received treatment for excessive noise exposure while on active duty. Essentially, the quoted paragraph disregards the studies that already exist, showing that there are adverse impacts on human health other than auditory health. How can the Navy not even acknowledge that there is at least a "potential" for a relevant correlation. Is it because that might preclude justly reaching a future finding of "No Significant Impact" for any of the proposals contained in the DEIS?

Further, the reference at the beginning of the paragraph quoted above references "studies noted and evaluated in Section 3.2.3." A reading of Section 3.2.3 reveals over a dozen references to statements or partial quotes regarding noise in the context of annoyance, speech interference, classroom/learning interference, sleep disturbance, potential noise effects on recreation, potential hearing loss, non-auditory health effects, and vibrations from aircraft operations. The

quoted paragraph then characterizes the studies in the following words: "inconclusive data and research, no definitive connection between "intermittent" noise and health, studies are inconclusive, and that factors other than noise have a "larger and more direct effect." Those words, if permitted by the Navy leadership to carry the day, the Navy in my opinion one day will rue them. Bigly. The effect of those words is to say that, notwithstanding any and all objective studies conducted to date, the burden of proof is upon the people who today may continue to be damaged and injured by actions of the Navy, and that the Navy has no interest in listening or learning or studying any possibility to the contrary.

It also shows that, because of this Navy intransigence in the face of mounting evidence to a contrary position, it is difficult if not impossible to have any faith or confidence in the Navy to make the right choice or do the right thing regarding any aspect of the continued Navy use of OLFC.

The position of the Navy disregards all evidence and research, subjective and objective, that increasing the number of FCLP's at OLFC from 6,100 to as many as 35,100 per year will NOT affect some children, mothers, fathers and others.

For the Navy not to even admit there is a possibility that conducting FCLP operations at OLFC under the present levels of 6,100 FCLP operations per year, nor by increasing those levels by a factor of about 5.75, might have adverse health impacts, is to cast a deep and dark shadow upon the leadership of the Navy that should be made known on a widespread basis to both the public and to federal and state elected officials. That is a position that lives in contradistinction to a different story presently unfolding regarding the effects on some peoples' health of living and working around gross and horrific noise conditions. All of us deserve and should demand that due consideration be acknowledged, planned, and given to the health and welfare of all the people who live in the vicinity of OLFC as well as the military personnel and civilians who live near NAS Whidbey even for the present levels of FCLP operations conducted on Whidbey Island.

My own personal experience with High Blood Pressure is one subjective example of a probable connection between living near OLFC and the onset of high blood pressure. I have undergone an annual physical examination I believe for each of the last 30 years and my blood pressure has been measured many dozens of times in many differing situations. My record reveals that prior to moving to Whidbey Island, I never was in need of medication to control or lower my blood pressure. A few years after moving to Whidbey Island, I was diagnosed as being in need of medication for blood pressure, notwithstanding that I have lived on Whidbey Island a near storybook life of relative and selective seclusion. Building a world class garden for my wife and I to enjoy. In that, I believe I have succeeded. I will be the first to admit that the impact of aging likely is a contributing factor to an increase in high blood pressure events. However, I also will swear, under oath, that during periods when FCLPs are undertaken at OLFC, those are the only periods of time when I feel a sense of helplessness to combat anxiety, anger, rage, and a slow burning seething of knowing that the honorable United States Navy doesn't want a true delineation of factual reality, it simply wants to complete a superficial, understated response to a Federal requirement to prepare an assessment of the impact of a Navy plan that already has been approved in concept if not in particulars and then make a finding of "No Significant Impact" upon my life and those of the many of us who live below the noise generated by Growlers. Further, it is documented that when I leave Whidbey Island (I sometimes spend a few weeks each year year in Hawaii), my blood pressure after a few days returns to normal levels. Even during periods when FCLP operations are not prevalent at OLFC, I seem to have lower high blood pressure events. I mention my own personal history in this regard not to seek sympathy

or empathy but merely to indicate that continued intransigence on the part of the Navy, as by refusing to acknowledge the obvious, is slowly being exposed as unconscionable and calloused, and in defiance of the real world in which peoples' lives are being adversely impacted by Growler FCLP landing noise, at least in the context of OLFC.

One other aspect of the Navy's "No Significant Impact" position on the conduct of FCLP operations at OLFC bears discussion. It is true and undeniable that, considering only the computer-generated modeling upon which the DEIS clearly is based, that no one can measure adverse impact on land, buildings, animals, or people. But to conclude that because medical, health and other areas of study do not definitively conclude that damages and adverse impacts are measurable is not a justifiable or logical basis to conclude that there is no damage or adverse impact. For example, no one can predict with certainty whether any one person will succumb to the ill effects of influenza or a virus-induced nasal or respiratory infection. Some people whose immunity systems are strong may well not become a victim this year to a cold or the flu. Some of those same people next year may well become victims to the same or similar diseases. The fact is, however, that some people fall victim to colds and the flu and some do not. However, using Navy logic, there is no clear linkage or convincing connection between presence on any Navy base and catching a cold or the flu, and that, therefore, there is no need to have good hygiene in terms of cleanliness on a NAS.

My point is that the fact that "causation" is not fully known, or that personal susceptibility is not fully known, does not mean there is no causal connection between aircraft noise, especially the concentrated nature of FCLP noise, and health issues that may shorten people's lives or adversely impact their ability to live a good life. Further, in the context of children, some kids are susceptible to or actually may be diagnosed as having Attention Deficit Disorders (ADD), and one consequence of such a diagnosis may be inability of a child with ADD to focus or stay on task during school. To say that "intermittent" interruptions or distractions inherent in FCLP Growler noise is not a "Significant Adverse Impact" is to defy common sense and basic logic. Those impacts certainly are worthy of consideration by the Navy before the episodes of interruption and distraction are increased by a factor of up to 5.75. The lives of all children are significant and should not continue to be ignored and disregarded by the Navy and its continued use of OLFC.

Consider the data NOT included in the DEIS. While there is a Table that shows for each POI the "Maximum Sound Exposure Level and Maximum Sound Level for the POI's it doesn't project those levels for the FCLP's contemplated by each of the 9 proposals. Instead, the DEIS gives us the actual number of times that the projected maximum SEL is reached per year. A range, including all FCLP's in a year would seem to be a good thing to know if you want to assess the annual, monthly or daily exposure levels and compare those with the limits set by OSHA and NIOSH. Of course, that would depend upon the number of FCLP's projected to use Runway 14 and 32 at OLFC, on each flying day as well as the number of flying days projected, as well as the overflights of arrivals and departures from Ault Field that entail flying over OLFC, and as well as arrivals and departures from OLFC FCLP closed loop patterns.

The DEIS also indicates the number of people at OLFC who are estimated at risk for hearing loss (See, for example, Table 6-8a for Alternative 1, Scenario A). But there is nothing to suggest where those projected people live, work or lie in a bed at the Whidbey General Hospital. It tells you how many people there are within each Leq 24 band, but it doesn't tell you how to convert those band numbers to DNL contours or where those numbers are on the contour maps. I expect that its only real value is to provide a basis for claiming that the number of people isn't

very large. But if past practice is tomorrow's guidance it will be used by the Navy only for defensive purposes, as if we are talking about a game. A game with civilians' lives.

I would like to provide my perspective and analysis regarding health issues, because those are important. While I have children, grandchildren and great grandchildren, none live anywhere close to Whidbey Island. But I care about people on Whidbey Island who live around OLFC. I care about the pregnant mothers with their unborn fetuses with developing ears, and I care about kids playing softball or soccer outside and below FCLP flight paths, and I care about all the people, many retired, who have developed a love of gardens and gardening whose hearing already has suffered, notwithstanding the Navy's mantra that hearing losses won't occur without 40-years of Growler noise.

I strongly believe the Navy does not care, not because they are cold and calloused individuals, but because the information in the DEIS facilitates a finding of not much impact ever, anywhere, while discrediting a private study finding that the Navy projections fall short of reality and notwithstanding a second private study that apparently validates the first study's integrity. My ultimate conclusion is that if those of us disheartened by Navy internal politics and their DEIS's really care, we must take the fight into the public arena of politics and policy at the state and national levels. There is a right side and a wrong side to continued use of OLFC, and I believe the Navy cannot be trusted to do the right thing and find a permanent solution to safeguard the people's rights to enjoy life in the manner contemplated by NEPA and the Constitution of the United States of America. It is up to us, here on Whidbey Island, to assist the Navy in doing the right thing. The Navy has a voice but cannot hear.

A replacement location for a new OLF is the only answer that avoids considerable adverse impacts on many if not most all of us civilians who live in the vicinity of OLFC. Further, the existing level of FCLP operations at OLFC has never adequately considered any adverse impacts on the health of the civilians who live with Growler noise and impacts; and those impacts could be avoided with a little Navy leadership to find an alternative site for FCLP operations and activities.

There is a study of Aircraft noise at OLFC during FCLP operations, secured by Citizens Of Ebey Reserve (hereafter COER) and performed by JGL Acoustics Hereafter JGL). JGL took actual measurements from five locations near OLFC during Growler flights that utilized Runway 32 in the performance of FCLPs in 2013. The JGL Noise Study referenced above revealed that the projections in a computer modeled program forming the data for the analysis of the Navy and of Wyle Laboratories set forth in the DEIS understated the true, actual noise levels.

It is noteworthy that I am unable to find a single reference to a study secured by the Navy utilizing actual recorded measurements, or verifying its earlier projections. It follows that there is no preserved data upon which to build a library that might be useful, if referencing actual facts ever becomes a noble course of action. In fact, there are references in writings to actual measurements taken by the United States Air Force in the context of noise generated by Air Force aircraft. In the context of OLFC, actual measurements might show that the projections of noise at OLFC by the Navy are too high or too low. Wouldn't it be useful, educational, and revealing to test the relative accuracy of the Navy's projections? What possibly might be the rationale behind the policy of the Navy's disinclination to using actual measurements?

But there is an enormous amount of information, alarming information, that noise is dangerous not just to a person's hearing. The Centers for Disease Control and Prevention, on February 8, 2016, posted an article entitled "[Understanding Noise Exposure Limits: Occupational vs.](#)

General Environmental Noise. In regard to non-auditory health effects, the article reads, in part, as follows:

“The most investigated non-auditory health endpoints for noise exposure are perceived disturbance and annoyance, cognitive impairment (mainly in children), sleep disturbance, and cardiovascular health. WHO estimated that in high-income western European countries (population about 340 million people), at least 1 million healthy life-years (disability-adjusted life-years (DALY’s)) are lost every year because of environmental noise.” “Most of these DALYs can be attributed to noise-induced sleep disturbance and annoyance. DALYs=Disability-adjusted life years.”

“Annoyance. Annoyance is the most prevalent community response in a population exposed to environmental noise. Noise annoyance can result from noise interfering with daily activities, feelings, thoughts, sleep, or rest, and might be accompanied by negative responses, such as anger, displeasure, exhaustion, and by stress-related symptoms. In severe forms, it could be thought to affect wellbeing and health, and because of the high number of people affected, annoyance substantially contributes to the burden of disease from environmental noise (figure 2). Investigators have proposed standardised questions about residents' long-term annoyance in their home for use in surveys. Additionally, investigators have gathered substantial data for community annoyance in residents exposed to noise in their home, based on which exposure–response relationships were derived (eg, for wind turbines). These relations can be used in strategic or health impact assessments for estimating long-term annoyance in fairly stable situations. Although the overall community response depends on societal values and is most relevant to the guidance of policy, several personal (eg, age and noise sensitivity) and situational characteristics (eg, dwelling insulation) might affect the individual degree of annoyance.”

“Cardiovascular disease. Both short-term laboratory studies of human beings and long-term studies of animals have provided biological mechanisms and plausibility for the theory that long-term exposure to environmental noise affects the cardiovascular system and causes manifest diseases (including hypertension, ischaemic heart diseases, and stroke). Acute exposure to different kinds of noise is associated with arousals of the autonomic nervous system and endocrine system. Investigators have repeatedly noted that noise exposure increases systolic and diastolic blood pressure, changes heart rate, and causes the release of stress hormones (including catecholamines and glucocorticoids). The general stress model is the rationale behind these reactions. Potential mechanisms are emotional stress reactions due to perceived discomfort (indirect pathway), and non-conscious physiological stress from interactions between the central auditory system and other regions of the CNS (direct pathway). The direct pathway might be the predominant mechanism in sleeping individuals, even at low noise levels. Chronic exposure can cause an imbalance in an organism’s homoeostasis (allostatic load), which affects metabolism and the cardiovascular system, with increases in established cardiovascular disease risk factors such as blood pressure, blood lipid concentrations, blood viscosity, and blood glucose concentrations. These changes increase the risk of hypertension, arteriosclerosis, and are related to severe events, such as myocardial infarction and stroke. Studies of occupational and environmental epidemiology have shown a higher prevalence and incidence of cardiovascular diseases and mortality in highly noise-exposed groups. The risk estimates for occupational noise at ear-damaging intensities tend to be higher than are those for environmental noise (at lower noise levels). Because of different acoustic characteristics for different noise sources (sound level, frequency spectrum, time course, sound level rise time, and psychoacoustic measures) noise levels from different noise sources cannot be merged into one indicator of decibels. Different exposure–response curves are needed for different noise

sources. Meta-analyses were done to quantitatively assess the exposure–response link for transportation noise (exposure to road traffic and aircraft noise) and health effects (hypertension and ischaemic heart diseases, including myocardial infarction). The investigators derived increases in risk of between 7% and 17% per 10 dB increase in equivalent noise level LAeq (figure 3). Their results have been adjusted for known risk factors such as age, sex, socioeconomic status, smoking, body-mass index, and others. The researchers identified sex and age as effect modifiers. Studies of the combined effects of noise and air pollution showed largely independent effects, which can be explained by different mechanisms of how both exposures can affect health (cognitive and autonomic stress response vs inflammatory processes).”

“Cognitive performance . WHO estimate that about 45 000 disability-adjusted life-years are lost every year in high-income western European countries for children aged 7–19 years because of environmental noise exposure (figure 2). Postulated mechanisms for noise effects on children’s cognition include communication difficulties, impaired attention, increased arousal, learned helplessness, frustration, noise annoyance, and consequences of sleep disturbance on performance.^{3, 56} Investigators have also suggested psychological stress responses as a mechanism because children are poor at appraising threats from stressors and have less well developed coping strategies than do adults. Areas with high levels of environmental noise are often socially deprived, and children from areas with high social deprivation do worse on tests of cognition than do children not exposed to social deprivation. Therefore, measures of socioeconomic position should be taken into account in the assessment of associations between noise exposure and health and cognition.”

“More than 20 studies have shown environmental noise exposure has a negative effect on children’s learning outcomes and cognitive performance,⁵⁷ and that children with chronic aircraft, road traffic, or rail noise exposure at school have poorer reading ability, memory, and performance on national standardised tests than do children who are not exposed to noise at school. Investigators have examined exposure–effect links between noise exposure and cognition to identify the exposure level at which noise effects begin. The RANCH study of 2844 children aged 9–10 years attending 89 schools around Heathrow (London, UK), Schiphol (Amsterdam, the Netherlands), and Madrid-Barajas (Spain) airports showed a linear exposure–effect relation between aircraft noise exposure at school and a child’s reading comprehension and recognition memory after adjusting for a range of socioeconomic factors. A LAeq 5 dB increase in aircraft noise exposure was associated with a 2 month delay in reading age in children in the UK and a 1 month delay in those in the Netherlands. These linear associations suggest that there is no threshold for effects and any reduction in noise level at school should improve a child’s cognition.”

“WHO Community Noise Guidelines⁶³ suggest that the background sound pressure level should not exceed LAeq 35 dB during teaching sessions. Intervention studies and natural experiments have shown that reductions in noise exposure from insulation or the closure of airports are associated with improvements in cognition, suggesting that noise reduction can eliminate noise effects on cognition.”

“Sleep disturbance. Sleep disturbance is thought to be the most deleterious non-auditory effect of environmental noise exposure (figure 2), because undisturbed sleep of a sufficient length is needed for daytime alertness and performance, quality of life, and health. Human beings perceive, evaluate, and react to environmental sounds, even while asleep. Maximum sound pressure levels as low as LAmax 33 dB can induce physiological reactions during sleep including autonomic, motor, and cortical arousals (eg, tachycardia, body movements, and awakenings). Whether noise will induce arousals depends not only on the number of noise events and their acoustical properties,² but also on situational moderators (such as momentary

sleep stage66) and individual noise susceptibility. Elderly people, children, shift-workers, and people with a pre-existing (sleep) disorder are thought of as at-risk groups for noise-induced sleep disturbance. Repeated noise-induced arousals interfere with sleep quality through changes in sleep structure, which include delayed sleep onset and early awakenings, reduced deep (slow-wave) and rapid eye movement sleep, and an increase in time spent awake and in superficial sleep stages. However, these effects are not specific for noise, and generally less severe than those in clinical sleep disorders such as obstructive sleep apnea. Short-term effects of noise-induced sleep disturbance include impaired mood, subjectively and objectively increased daytime sleepiness, and impaired cognitive performance. Results of epidemiological studies indicate that nocturnal noise exposure might be more relevant for the creation of long-term health outcomes such as cardiovascular disease than is daytime noise exposure, probably because of repeated autonomic arousals that have been shown to habituate to a much lesser degree to noise than other—eg, cortical—arousals.² In 2009, WHO published the Night Noise Guidelines for Europe, an expert consensus mapping four noise exposure groups to negative health outcomes ranging from no substantial biological effects to increased risk of cardiovascular disease (panel 2). WHO regards average nocturnal noise levels of less than LAeq, outside 55 dB to be an interim goal and 40 dB a long-term goal for the prevention of noise-induced health effects.”

“Conclusion. “Noise is pervasive in everyday life and can cause both auditory and non-auditory health effects. Noise-induced hearing loss remains highly prevalent in occupational settings, and is increasingly caused by social noise exposure (eg, through personal music players). Our understanding of molecular mechanisms involved in noise-induced hair-cell and nerve damage has substantially increased, and preventive and therapeutic drugs will probably become available within 10 years. Evidence of the non-auditory effects of environmental noise exposure on public health is growing. Observational and experimental studies have shown that noise exposure leads to annoyance, disturbs sleep and causes daytime sleepiness, affects patient outcomes and staff performance in hospitals, increases the occurrence of hypertension and cardiovascular disease, and impairs cognitive performance in schoolchildren. In this Review, we stress the importance of adequate noise prevention and mitigation strategies for public health.”

The mountain of evidence is growing. While I cannot vouch 100% for the validity of the enormous data that exists, isn't it better to tread on the side of caution than to expect civilians to follow the Navy's lead and just ignore serious and documented health issues? Is that all we can expect from the United States Navy?

Andrew Carnegie once said “as I grow older, I pay less attention to what men say. I just watch what they do.” Actions or intransigence by the Navy do speak to in a far louder voice than the words they chose for the DEIS.

SECTION 14.

NAVY AVIGATION EASEMENTS NEAR OLFC: A BAD OF NAVY LEADERSHIP AND COMMUNITY INTERACTION

An Avigation easement is a property interest that entails the right of overflight in the airspace above or in the vicinity of a particular parcel of lot of real property. It also includes the right to create such noise or other effects as may result from the lawful operation of aircraft in such airspace, absent any limitations or exceptions set forth in the terms of the easement, and the right to remove any obstructions to such overflight. Hence, an avigation easement generally would authorize aircraft approaching an airport or landing strip like OLFC, to fly at low elevations above private property.

Regardless of whether the Navy wants anyone to know about Navy use of avigation easements on Whidbey Island in connection with overflights of private residences at low altitudes in the performance of some level of FCLP operations, the Navy has acquired by the payment of U.S. dollars avigation easements in regard to some number of lots or parcels in Admirals Cove and in property adjacent or close to OLFC. Further, in lawsuits in Federal Courts, the Navy has asserted in multiple cases that it acquired a prescriptive avigation easement by virtue of having flown over private property for considerable lengths of time, and asserted that prescriptive right as a defense in a "takings" lawsuit.

Nonetheless, in Argent v. United States, 124F.3d 1277 (1999), the court acknowledged that changing circumstances, such as faster and noisier aircraft (for example, the EA-18G Growler has both a noisier profile than the Prowler and also emits a low-frequency sound that is more dangerous than the higher frequency emitted by the Prowler; and of course recall that the DEIS is proposing up to 35,100 FCLP operations, a 575 percent increase from the current levels of 6,100), may effect a second, different "taking". While the Navy actually flew more than 6,100 FCLP operations, that excess was the basis of a federal court enjoining the Navy from continuing to perform more than 6,100 FCLP operations per year. The point here is that there likely will be held to be a new "taking" if the FCLP operations are increased in fact to more than 6,100, especially given the Navy's actions relating to establishing the limit of 6,100.

Under state law, an interest in real property is required to be recorded, so as to provide subsequent owners with a basis to be informed of the existence of any encumbrance, lien, easement, or other interest that could affect a new owner's plans for using the property.

It is interesting to note that multiple trips to the Island County Recorder's Office as well as to the Federal District Courthouse in Seattle failed to turn up a single instance of the recordation of an Avigation Easement of the Navy. I became interested in this regard when I was assisting a friend in the purchase of a 26-acre parcel of undeveloped land that is adjacent to the lot upon which my home was constructed following purchase of the lot in 2001. My friend made an offer that was accepted, and he received a Preliminary Policy of Title Insurance that indicated easements, but no Avigation or other Easement owned or held by the Navy. While my friend ultimately decided against consummating the purchase, that property ultimately was purchased by another person who later became a friend. Recently, my wife asked the new owner whether his Title Insurance Policy contained any acknowledgement of the existence of any Avigation or other Easement in favor of the Navy. This inquiry was made subsequent to finding the whereabouts of the prior owner and he presently is living in Florida. He refused to discuss any aspect of an Avigation Easement. Because we also had obtained a copy of numerous Avigation

Easements, including one signed by the guy in Florida (but who formerly lived and worked in Seattle), his refusal piqued my level of interest, which led to finding a bunch of other Avigation Easements and documentary evidence. Including learning that a sum of \$750,000 was paid by the United States Navy for a group of those easements. One in particular was to a person who lives near Coupeville. My diplomatic wife went to visit the gentleman in his shop and his reaction was similar to the reaction of a movie actor who is afraid of the mafia. No kidding. He quickly said he could not and would not discuss such a matter with anyone, ever. End of that discussion.

To me, the reaction of both gentlemen suggests that both have signed Nondisclosure Agreements containing some form of penalty for disclosure in violation of the nondisclosure provision. Or is there another explanation. Well, certainly, no disclosure publicly has been made by the Navy.

There is also some evidence that a representative of the Navy denied in an email the existence of a known Avigation Easement, but that might simply be explained in terms of that person not knowing what she was doing or where to find an accurate answer. On the other hand, maybe she was absolutely correct.

Nonetheless, I find it impossible to accept the distinct possibility that the Navy is hiding something here. I am hereby asking Navy Leadership to divulge publicly both the existence of all Avigation Easements they have acquired by purchase or by prescription, the price paid, and the parcel and street address of all such property situated in Island County Washington. That information does not involve any secrets affecting national security, and could be obtained through the Federal Freedom of Information Act. But it is disconcerting that the Navy paid money for an easement that is a legal interest (indeed, it is an encumbrance upon the property subject to it) as to property, including property owned by a friend who is a lifelong resident on Whidbey Island and a contractor/developer. By not recording it, the Navy deprived my friend, the current owner of the property, that the property was subject to the easement. That likely would have affected the purchase price, or at least his offer. If the Navy had recorded the easement, it would have been set forth in the Title Insurance Policy, the same as all the other encumbrances. Although in some judicial proceedings, the Navy likely could be precluded by a court from asserting its rights under the easement. In terms of the laws relating to "Equity" the Navy cannot benefit from having "dirty hands." I wonder what the CINC of the Navy would have to say about this. At best, it is unseemly, to me.

That isn't the end of the Avigation Easement saga. It gets worser and worser.

Why would the Navy pay some residents for an Avigation Easement and essentially hide it from others? Why would the Navy treat some civilian residents different from the way it treats others? That is a confounding and troubling scenario that should be investigated by the Armed Services Committee of the United States Senate and by the Oversight Committee of the House of Representatives of the United States. Is it unique, or is it the norm? To me, it is a power that should be reined in a bit.

Also, it is troubling to me that the United States Navy would assert as a defense in any trial involving American Citizens in which an unlawful "taking" by the Navy is alleged. The reason it would be alleged is twofold: (1) It would negate the recovery for any claim for a "taking" if the "taking" occurred more than six years prior to the alleged date of the taking, and (2) it would negate the claim if the "taking" occurred less than six years ago and the allegations refer only to acts that are clearly authorized by the terms of the easement (for example if overflights higher

than say 1,000 are permitted under the easement and the Plaintiff could not prove there have been any flights less than 1,000 feet). In my view, it is or should be against public policy (maybe it already is) for the Navy to use technical defenses against Citizens of the United States. The Navy should be held to a higher standard so as to be forced to treat all Citizens equally, even if it is not so inclined.

In the context of "takings" cases, the United States Constitution prohibits the taking of private property for public use without just compensation, and declares that no person shall be deprived of property without Due Process of Law (Fifth Amendment, United States Constitution). Cases of the United States Supreme Court, in regard to the necessity of Due Process, have imposed certain substantive and procedural requirements before any deprivation of property is imposed. While a statute of limitations serves the public policy of requiring actions for remedies to be initiated prior to the expiration of a prescribed period of time (for example, a 3-year period of time in which to seek a judicial remedy for a breach of contract, which serves as a reasonable period of time after which the uncertainty of having a possible lawsuit for an unlimited period of time, as well as avoiding the shadow of uncertainty as to the enforceability of contracts upon conduct of commerce) is outweighed by the need for certainty to prevail in contractual disputes. The nature of that policy does not apply to a complex situation involving thousands of lots and homes in the vicinity of OLFC, especially where the Navy has apparently been hiding the fact of Avigation Easements and its selective use of taxpayer dollars to purchase a few such easements, quietly.

Maybe I expect too much from the Navy, but they should do better than their past record suggests. Perhaps, the best solution will be to seek an Amendment to some appropriations bill for Navy expenditures to extend the right to sue the Navy for a "taking" of real property, within the protections of the Fifth Amendment to the United States Constitution, for 50 years, and to negate any prior use of a statute of limitations in "taking" by Aircraft noise cases already concluded. Citizens of the United States deserve to be, and should be, treated reasonably by the Navy.

It is worth noting that the assertion of an affirmative defense in any case, including a defense based upon the expiration of a period of time set forth in a statute of limitations, doesn't mean the underlying cause of action isn't valid or worthy. It merely means that the sought after remedy is no longer available, but only if the statute of limitations is asserted as a defense. If it is not asserted, the trial will continue. In part, the assertion by the Navy of a statute of limitations in a case involving an alleged "taking" in violation of the Fifth Amendment in the context of FCLP operations at OLFC, where it is shown that the Navy has dirtied it's hands by hiding the existence of easements would be to reward the Navy for bad behavior that flies in the face of the mandates and requirements of NEPA. In other words, it would seem to me to violate a basic consideration of knowing the difference between right and wrong.

SECTION 15.

NOISE ABATEMENT

The DEIS includes what is no doubt a long-standing policy statement regarding training and operational flights over local communities, including the numerous distinct neighborhoods that literally surround OLF. That policy statement, which is repeated several times in the DEIS, reads as follows: “It is Commanding Officer, NAS Whidbey Island policy to conduct required training and operational flights with as minimal impact as possible, including noise, on surrounding communities. All aircrews using” . . . [various Navy facilities, including OLF] “are responsible for the safe conduct of their mission while complying with published course rules, established noise-abatement procedures, and good common sense. Each aircrew must be familiar with the noise profiles of its aircraft and is expected to minimize noise impacts without compromising operational and safety requirements.” (see, for example, Sec. 4.2.5, Vol. 1., DEIS). Specific noise-abatement procedures and policy are outlined in Section 3.2. Similar or identical statements of the Commanding Officer, NAS Whidbey, are included in several other areas of the overwhelmingly large DEIS. If there exists a Navy policy to provide an enormous amount of information in a repetitive fashion for each of the **10 different scenarios**, then the DEIS is an overwhelming success. But I digress.

Section 4.2.5 reflects the same policy in considering each of the three Scenarios under Alternative 1, and clarifies what is NAS Whidbey Island, by expressly indicating that the “noise Abatement Policy applies to all aircrews using Ault Field, OLF Coupeville, Naval Weapons System Training Facility Boardman, and the numerous northwest instrument and visual training routes (IR/VR) throughout the Pacific Northwest. Additionally, the policy states that “aircrews are directed, to the maximum extent practicable, to employ prudent airmanship techniques to reduce aircraft noise impacts. Examples of noise-abatement procedures in the NAS Whidbey Island Air Operations Manual (NASWHIDBEYINST 3710.7Z, dated March 9, 2015, include all of the following:

- Aircrews shall, to the maximum extent possible, employ prudent airmanship techniques to reduce aircraft noise impacts and to avoid noise-sensitive areas except when being vectored by radar ATC or specifically directed by the control tower.
- Sunday Operations: From 7:30 a.m. to noon local on Sundays, noise-abatement procedures require arrivals, except scheduled FCLP/CCA aircraft, VR-61 drilling reservists, and VP-69 drilling reservists, to make full-stop landings.
- Due to noise-abatement procedures, high-power turn-ups should not be conducted prior to noon on Sundays or between the hours of 10:00 p.m. to 7:30 a.m. for jets and midnight to 7:30 a.m. for turboprops. For specific operational necessity requirements, defined as preparation for missions other than routine local training and functional check flights terminating at NAS Whidbey Island, high-power turn-ups may be authorized outside these established hours.
- Wind component and traffic permitting, morning departures prior to 8:00 a.m. shall use Runway 25, and evening arrivals after 10:00 p.m. shall use Runway 7 to maximize flight over open water.
- Make smooth power changes. Large, abrupt changes in power result in large, abrupt changes in sound level on the ground.
- The maximum number of aircraft in the FCLP flight pattern is five. This is so the FCLP pattern stays within the 5-mile radius of the class “Charlie” airspace, aircraft do not get extended creating additional noise impacts, and allowances may be made for non-FCLP aircraft to operate concurrently.

- Avoiding noise-sensitive and wilderness areas by flying at altitudes of no less than 3,000 feet AGL except when in compliance with an approved traffic or approach pattern, military training route, or within Special Use Airspace.”

That is a lengthy quotation, but it is worthwhile to understand that there are written directives. Nonetheless, there have existed Growler and Prowler Pilots who adhere to all of those directives and a few that do not. This perception has existed for the entirety of my time spent on Whidbey Island during the past 14 years. And Whidbey is my only place of domicile. I reside on Whidbey year-round and am absent only for vacations or family visits. In other words, it is one thing to have directives and it is quite another to enforce those directives. I have no information regarding enforcement, but believe that in my 14 years of living on Whidbey in the same home, and likely spending more time outdoors and in my backyard doing construction, maintenance and one heckuva lot of gardening than anyone I know, I have accumulated knowledge about pilot idiosyncrasies and predilections. For example what young man wouldn't like to fly like a wild man or test his or Growler limits? I acknowledge that there are not many occasions to do so because piloting even a Whidbey-based Growler is subject to the inherent directives involved in flying in closed loops in a safe and sane manner. However, there are gaps in the inherent controls on pilot behavior. For example, most of the pilots who exit from a closed loop pattern at OLFC and fly on a heading back toward Ault Field, attain a safe altitude before they cross the coast line of Penn Cove (when Runway 32 is used), and throttle back until well out over the waters of Penn Cove and only then execute a right turn over the water and proceed around Strawberry Point and onward somewhere eventually out of my sight, landing at Ault Field. Those nice guy pilots also fly a heading that represents a continuation of the center-line-extended of OLFC, until well out over the waters of Penn Cove. Then there are the other pilots. The ones who sometimes seem hell bent upon catching up with the aircraft ahead of him/her and first fly a heading 10-25 degrees to the right from the center line extended of OLFC, then execute first a sharp left turn to avoid a stand of tall Douglas Firs between Parker Road and the water line of Penn Cove, and then quickly execute another right turn sometimes flying with the wings on the Growler at a position that is perpendicular to the ground and at an increased ground speed well in excess of 250 knots and at an altitude that seems not to be more than 350 feet. That kind of flying was the subject of a conversation between [REDACTED] my wife, and the duty Officer at OLFC several years ago when you could reach a person in [REDACTED] of a machine in regard to excessive noise involving excessive piloting. That Officer called back a day or two later and confirmed that he had figured out the culprit, because we had given him the precise time that the wings-perpendicular mode of flying occurred over our home located to the north by northwest of runway 14. He also said he had discussed the matter with that pilot and said that it would not happen again. It didn't, for a couple of months. Then, maybe a new crop of pilots showed up.

That type of flying also seems to be the subject of a manual devoted to the do's and don'ts of piloting contained in OPNAVINST 3710.7U. In regard to Flight-related disturbances, the Regulation at 5.5.1 reads:

“Annoyance to Civilians and Endangering Private Property. Flights of naval aircraft shall be conducted so that a minimum of annoyance is experienced by persons on the ground. [Ahem - please read that again] It is not enough for the pilot to be satisfied that no person is actually endangered. Definite and particular effort shall be taken to fly in such a manner that individuals do not believe they or their property are endangered (I guess that should be read as “reasonable” individuals?). The following specific restrictions apply in view of the particularly unfavorable effect of the fear, extreme annoyance, and damage that can be inflicted. . . .”

“5.5.1.6 Flat Hatting Flat hatting or any maneuvers conducted at low altitude and /or a high rate of speed for thrill purpose over land or water are prohibited. Any act conducted for thrill purpose are strictly prohibited.”

became aware that a new Commander had been installed at NAS Whidbey, we perceived a reduction in the frequency of over-the-line piloting, but acknowledge that deployments may well change the nature of the unnecessary noise scene. There likely will always be a few that seem to take delight in flying differently and generating more noise than the gentlemen. I even have a visual of Sen. John McCain, who we all know was, at a minimum, a very aggressive pilot, in addition to his being a National Hero and a Great American. Aggressive piloting likely was/is in his blood. And he always has been a Great American.

At the scoping meeting in Coupeville, we also specifically asked [REDACTED] why it was no longer possible to reach a live person when we had an issue we w [REDACTED] discuss. I don't know when the new policy of only being able to reach a recording machine in lieu of a real person was implemented. His response was that we wouldn't believe some of the abuse and language employed by some people in making complaints or reporting particular incidents. Not being able to reach a real person lessens the likelihood that a real problem might be resolved with timely input from civilians, like us. He said the new policy was introduced to insulate the Navy's personnel who were monitoring live reporting. But it goes far beyond that. I agree that abuse likely is a huge issue coming from some folks who live near OLFC. Indeed, I invoked 5 full years of silence upon my next door neighbor in lieu of attempting to communicate with that neighbor. But I didn't cut off communicating with anyone else. I would support a three strikes of abuse (maybe two would be best) and you are thereafter barred kind of system, instead. The Navy could place a block on any calls from any telephone number they choose. In essence, I don't think eliminating the possibility of resolving some issues that may depend upon timely input is the best policy that could be employed. My personal experience is but one example. Finally, if you call the complaint line and leave a message, the return call may arrive when the complainer isn't available. That happened to [REDACTED] twice over time. Although [REDACTED] then returned the return call, but the person (Jennifer Me [REDACTED] was not available) never [REDACTED] ed back. We could do better, I think.

Complaints about excessive piloting behavior of Navy personnel, in my opinion, are worthy of listening to in a timely manner. The present level of the lack of an opportunity for timely communications would seem to me to be an undesirable thing to the Navy, especially when there is so much hostility on both sides of the noise issues arising from FCLP operations at OLFC. It would also reduce the likelihood that a "problem" pilot could be identified and issued stern warnings about "flat hatting."

SECTION 16.**THE NAVY, NEPA, AND
PREDICTABLE FINDINGS OF “NO SIGNIFICANT IMPACT”**

In performing research, preliminary to drafting these comments, I discovered dozens of instances in which the United States Navy has prepared and put into the “public domain” Draft Environmental Impact Statements” (hereafter DEIS) for various “projects” involving widely differing aspects of Naval duties and missions. Most involved new equipment or additional equipment assigned to various Navy bases.

I am dismayed by my inability to find a single instance in which the Navy, notwithstanding the advent of bigger, stronger, faster, louder equipment, has ever reached a finding that its proposal for aircraft or equipment would have anything other than “No Significant Impact.” My dismay may be misplaced by not looking long enough. Also, my dismay may best be directed toward the entire EIS process, rather than the Navy in particular. To me, the EIS process invites investigation and perhaps a legislative revamping of the process required to adopt, implement, and deploy new equipment that affects or has the potential to affect civilians and military personnel regardless of where they reside. Why? First, in the context of a Navy DEIS, the Navy performs the task of coming up with “data” that often is created in a manner that understates or avoids analysis of the essential issues. The Navy has been accorded “great discretion” in selecting the metrics to be used in the DEIS. It is apparent that their metric selection skills leave much to be desired, if accurate and objective portrayals of “facts” are considered important. If not, then the current system is a facade and virtually worthless, in my opinion. After selecting the metrics and providing the data for analysis by experts hired by the Navy, the Navy makes a finding of “No Significant Impact,” thereby avoiding the necessity to do any further environmental work.

Worse, in prior years, as in replacing the predecessor Prowler with the Growler, the Navy declared that the Growler is “quieter” than the Prowler (in many respects it is not). In prior years, the DNL numbers for the Prowler were at a lower level than in years earlier and no explanation is given. Since DNL’s were based upon computer projections, using data provided by the Navy, it is disconcerting at best that the same software and same “experts” came up with new projections that assisted the Navy in making the argument that the Growler isn’t bad, it’s quieter than the Prowler. Or, perhaps, the Navy unilaterally fed new “data” to the computer program. Now, in the current iteration of a DEIS, the Navy is attempting to increase the number of FCLP operations to be conducted at the combination of NAS Whidbey and OLFC from 20,800 operations per year to as many as 43,900 per year, and showing a transparent preference for the alternative and scenario that would increase the Growler operations per year at OLFC from 6,100 to 35,100. And it has greased the skids for a “No Significant Impact,” as if that would be a fully objective conclusion. In fact, it clearly has nothing to do with objectivity. In my opinion, it is little more than merely a way around the obstacle that is NEPA and the EPA. It apparently even permits the vital

Tourist element of Coupeville's economy not even to be mentioned in the DEIS in the context of Coupeville's obvious economic reliance upon Tourism, notwithstanding that an increase in FCLP operations of anywhere close to 575 percent, as per Scenarios A, B, or C, of Alternative 1, 2, or 3, may well sound the death knell to Tourism anywhere within earshot of Coupeville.

Personally, I expected more integrity, forthrightness, and accountability from and within the Navy that is duty bound to protect both the United States of America and **all** of its citizens, including those who live in Coupeville or its Environs. It is tantamount to a Declaration of a War by Noise Terror upon the Civilians who live below the flight paths of the FCLP's performed at OLFC. It is a Declaration that the lives of people living below those flight paths don't matter. It is a Declaration that results from Navy logic that Trumpets The Mantra that the OLFC is the best landing field for these insane numbers of FCLP's. That is only because the Navy refuses, unreasonably, to consider any alternative FCLP sites.

The Navy and the United States Government own thousands of acres of land in the Pacific Northwest, indeed across the western portion of the United States. If the Navy was practicing dropping new versions of deep digging bombs or hypersonic missiles, would they say an area in which local governments have permitted civilian residential development to encroach close to the primary Navy base for testing new explosive devices is the best site to drop deadly new weaponry? I wonder. The obvious answer is that a new site should be secured for FCLP operations away from any population of civilians or military personnel. In the DEIS, the Navy only goes through the typical motions it has undertaken in countless other instances requiring the drafting of an EIS of considering the impacts upon people and the environment. It even hired outside contractors to conduct studies, using computer-generated data in lieu of real and actual and accurate data, to "prove" the absence of significant impact. The DEIS is a facade.

But the Navy does not ever say that there never will be people whose hearing will suffer, whose blood pressure won't reach dangerous levels, whose children will not suffer health-related impacts upon their education or learning abilities, whose fetuses will not suffer unknown disease or disability caused by extraordinary bursts of noise approaching or exceeding 125 decibels, that low-level sound waves generated by Growler engines won't have any impact on the fragile bluffs of Whidbey Island, or that existing home values will not continue to be adversely affected in the vicinity of OLFC. All of which actually may become reality in the lives of Civilians. Neither will the Navy aver or assert that there has never been an instance in which the Electronic Warfare equipment of EA-6B or EA-18G Prowlers or Growlers was used against civilians who reside on Whidbey Island below flight paths of those aircraft, including me (see Section 6. [Electronic Warfare against Civilians?](#), My Comments)

In essence, the EIS involves a process that absolutely allows the Navy to pick the information it chooses to present, allows the Navy to judge which of the several alternatives, if any, should be selected, adopted, and implemented, and doesn't even preclude the Navy from making its "findings" before the expiration of the period of time

allotted for public comments, which may not even have to be read, especially by an independent panel, and allows the Navy to then announce its selection of whichever alternative it favors, and allows the Navy to determine whether there will be any significant impact. It is laughable, but extremely sad, to say that the process is designed to reach an objective decision, given the number of EIS's in the Navy history that "determined" the absence of any significant impact. It is also laughable that the DEIS actually contains 10 different proposals, each a separate Alternative or Scenario and gives the public an opportunity for public comment; and provides for the OLFC area one copy of the DEIS for public use inside the Coupeville Library (after nearly one thousand residents showed up for the public scoping meeting in Coupeville in December 2016), in addition to several other copies placed in out of town communities, like Guemes, Orcas, and Lopez Island, and Sequim and on and on. The result is that you can read the DEIS online. It is very difficult to read it online and refer back to the Tables, Figures, and maps. It is two large volumes, over a dozen different sub-sections and appendices, and many more dozens of charts, figures, and tables, sometimes referred to but difficult to find quickly. I had no time to count, but I have read somewhere that it is something like 1500 pages. Thanks, United States Navy. I got the message.

The process is flawed terribly, as it is administered in a way unintended by Congress. Congress assumed that the dictates of fairness and even-handedness, indeed objectivity, would prevail, and that equal consideration would be given to civilians impacted by Navy proposals. In my opinion that has not happened, and isn't even close to happening, with this flawed DEIS.

SECTION 17.

“ISSUES” OF NAVY LEADERSHIP AND ACCOUNTABILITY

The sheer number of scandals across the United States military services raises serious questions and issues about leadership and accountability in the various military service.

The current Navy-related scandals include the “Fat Leonard” bribery scandal that has resulted in the termination of the Navy careers of at least 3 Admirals and numerous other Officers. In 2016, an additional Admiral pleaded guilty to making a false statement to a federal investigator regarding the “Fat Leonard” bribery scandal. Two of the three Admirals first mentioned above were given letters of censure and were determined to have demonstrated poor judgment and a failure of leadership by engaging in unethical conduct., and the other was demoted.

A Marine Corp. General, in the context of the need for leadership and accountability has stated that “We will still need men and women in uniform to call things as they see them and tell their subordinates and their superiors alike what they need to hear, not what they want to hear.”. . .”The time will come when you must stand alone in making a difficult, unpopular decision, or when you must challenge the opinion of superiors” . . .”[and] there will be moments when your entire career is at risk.” Sprinting Through The Tape, Major General Thomas L. Wilkerson, U. S. Marine Corps (Ret.), Proceedings Magazine, July 2008, Vol. 134/7/1,265.

The difficulty of taking a strong stand when your career is at risk is generously presented by the court-martial case of one Lt. CDR. Sean Kearns. That case resulted from the death of a Petty Officer during small-boat operations on February 4, 2009, in the Gulf of Aden. An accident had occurred that involved 3 crew members in an inflatable boat that unfortunately flipped while being lowered into the sea. Lt. CDR. Kearns was the Executive Officer of the USS San Antonio at the time, and was charged with negligence for failing to properly train and supervise small-boat operations. Kearns chose to take his case to a court-martial in lieu of accepting a reprimand as had been given and accepted by the ship’s captain. When asked why he refused administrative punishment, Kearns said: “Things needed to be made known. . . .Someone needed to stand up.”

The two sides in the court-martial case took very different positions. The prosecution’s position was that, regardless of circumstances, officers are responsible for the crew under their command. The defense argued that circumstances do matter and that, at some point, a Navy effort must extend beyond the confines of a single ship. The prosecution had not touched on the point that major material problems had plagued the USS San Antonio. Essentially, the ship had less than 100% of the resources necessary to accomplish its mission safely, but, nonetheless the Captain and Executive Officer were being held by the Navy to a standard that rendered irrelevant those limiting circumstances. Kearns was determined not to be responsible for the sailor’s death.

Following that acquittal, Four-Star Admiral John C. Harvey penned a message declaring that, in the future, officers and executive officers need not fear becoming a scapegoat when things go awry, but neither can you claim that less-than-ideal circumstances will absolve you of responsibility. “The absolute responsibility that you have is the Navy’s greatest strength because it gives you the ability to command. And with that responsibility comes the accountability that ensures command is worth something, and worthy of those we lead.” (USNI Foundation, Leadership and Accountability, Nov. 2010).

How does this discussion have application to the DEIS for EA-18G Operations at NAS Whidbey and Whidbey OLF? The DEIS has an enormous amount of information that, if accepted or approved, or both, will become tantamount to “facts” that likely will be looked at and essentially cited as factual by federal and other courts of law. In a letter, dated November 8, 2011, and written by the then Chief of Naval Operations, Admiral Jonathon W. Greenert stated that “Command is the foundation upon which our Navy rests.” “Authority, responsibility, and accountability are three essential principles which are the heart and soul of Command,” and that “you will be held accountable to the highest standards of personal and professional conduct.” It is my position that information in the DEIS is sordidly lacking in integrity and accuracy, and that even as a draft, it is not worthy of being representative of a document ready to be submitted to the general public, specifically the people of Whidbey Island, because it is not consistent with the above-referenced principles of command responsibility. It is a one-sided Navy document in support of what the Navy wants to do at OLFC and Ault Field, in terms of FCLP’s and little if any consideration is given to the requirements of NEPA and the Constitution of the United States (see Section 1, NEPA: The Federal National Environmental Policy Act of 1969 and the United States Navy, My Comments). Further, it is my opinion that the DEIS, in its entirety, should be withdrawn, thrown in the proverbial “can,” and reorganized and rewritten. Simply stated, in my opinion, the DEIS is beneath the dignity and expected performance of people who have been given the honor of command within the United States Navy.

In this regard, consider the Navy “flavor” expressed in the DEIS, in the light of Commander Nortier’s Declaration made under penalty of perjury and submitted in Case No. 2:13-cv-1232-TSV and filed May 29, 2015 in the United States District Court for the Western District of Washington at Seattle states as follows: “The population surrounding Ault Field is greater than that surrounding OLF Coupeville, which means noise impacts from aircraft operations at Ault Field impact a greater number of people than at Coupeville.” [The “2” is a reference to a footnote]. Footnote 2, accompanying that quote is another quote which reads as follows: “2 Populations data shows that in 2010, Coupeville, Washington populations was 1,831 and Oak harbor Washington population was 22,075.”

While I am not accusing Commander Nortier of perjury (he may not have written the document or even read it), in my opinion his declaration is at variance with the facts. First, the City of Oak Harbor is adjacent to Ault Field, but Coupeville is not adjacent to OLFC. Second, the contour lines for the “No Action Proposal” of the DEIS (meaning existing levels of flights) do not extend to include all of Oak Harbor, so it is misleading or deceptive to infer that all of the population of Oak Harbor is impacted by Ault Field flights. Indeed, runway 32 at Ault Field is seldom used and generally not used for FCLP’s. That is the runway closest to the Oak Harbor neighborhoods having the highest levels of density. None of the 4 Ault Field runways entail flying directly over the most populated neighborhoods of Oak harbor. In contrast, the population surrounding OLFC includes more people than live within Coupeville city limits. While Coupeville is at least 3 miles from OLFC, there is, for example, the community of Admirals Cove, which is several more than 3 miles from Coupeville’s City Limits and consists of over 400 homes and geographically is at the southern end of runway 32 at OLFC, as well as hundreds of other homes that lie within even the 65dB contours drawn for OLFC. Admirals Drive and Byrd Drive, which is in Admiral’s Cove, is the location of the POI near OLFC that has a DNL of 79 as projected in the DEIS near the end/beginning of runway 32. The POI having the highest DNL around Ault Field is for the POI of Sullivan Road. An online check of Sullivan Road reveals that there are 3 (three) registered voters who live on Sullivan Road (!). Third, the FCLP flight tracks drawn for Ault field primarily utilize runways 07 and 25, and seldom use runway 14 of 32, which Captain Nortier could have said means that FCLPs seldom invade the city limits of Oak Harbor and thus, don’t burden Oak Harbor residents to the same degree or extent as the people for example who live in Admirals Cove, because distance decreases dB levels. If you examine closely the topographical maps for the areas surrounding OLFC and Ault Field, you will see that the area directly below flight paths for OLFC are generally over more densely

populated areas than is the case for the people living below flight paths at Ault Field. Moreover, if you re-visit the topographical maps, there are few houses between the end of runway 25 and Dugualla Bay or between the coastline and runway 07 where I am able to detect zero homes. Contrasted with Admirals Cove or even my home on Kineth Point, there is a difference. Oh, also, my home is not within the City Limits of Coupeville. Neither is my neighborhood, the neighborhoods around Race Lagoon, Harrington Lagoon, the neighborhoods near and Snakelum Point and Long Point, and on down Parker Road nearly a mile to a sign greeting us with "Coupeville City Limits."

My only point is that there is a lot of evidence that suggests that the DEIS is not an objective document. It is intended to support the Navy's conclusions, as made in the past, that OLFC, not Ault Field, is worthy of more intolerable, damaging Growler-induced noise. And the words, "the Navy cares" ring hollow and on deafening ears.

There are other areas concerning operations that cry out for attention by Navy leadership. In my 14 years of full-time residence on Whidbey Island, and spending literally thousands of hours in my rather large and very nice Garden, and being a person who is observant by nature, I have become knowledgeable of idiosyncrasies and techniques of Prowler and now Growler Pilots and Crews, performance variables between Pilots, and the evolution of the meaning of the phrase "we want to have a dialog" which I cynically believe is intended for someone other than citizens of Whidbey Island who live in the vicinity of OLFC.

Let me contrast two or more different kinds of techniques utilized by Growler Pilots over OLFC. Upon executing a takeoff after a touch, when on the way back to NAS Whidbey for more fuel or food or rest, most Pilots stay on a course that is the extension of a straight line from the touchdown point at OLFC that is clearly parallel to the straight line created by the runway. Those Pilots apply lots of throttle until a safe altitude is attained (which normally occurs about ¼ to ½ mile prior to reaching the water line of the east side of Penn Cove (facing Ault Field and Oak Harbor). Once a safe altitude is attained, those Pilots throttle back for a mile or so (seemingly to reduce noise below) and then, over the waters of Penn Cove, throttle up as they begin to turn in an easterly direction over the water and ultimately turn left over water toward Dugualla Bay or somewhere close to begin the approach to land at Ault Field. [REDACTED] and I call those Pilots the nice guys.

Other Pilots deviate considerably from the straight line mentioned above, shortly after take off after a touch, execute a right turn of about 10-25 degrees to the east of runway 14 and then execute a left turn and then another right turn before getting to the waters of Penn Cove. Sometimes, the last two turns allow them to fly like proverbial Bats out of Hell. One of the few complaints we have made in 14 years was about a pilot who made those three turns after take-off and flew directly overhead my home with both wings perpendicular to the ground, and of course, throttled back only after he was 2 or so miles out and over Penn Cove. We call those kinds of Pilots the Pilots who fly their planes as if it was the last opportunity for a joy ride. I get the fact that it must be an enormous thrill to fly an EA-18G right to the absolute maximum or a little beyond, but it should not be up to me to say so. On that particular occasion, we actually could reach a public affairs person and on that occasion [REDACTED] actually spoke to the a person who identified himself to [REDACTED] as "Officer [REDACTED]." She did [REDACTED] have to remember it, as she wrote it down and saved her notes. She had no [REDACTED] precise time of that unnecessary maneuver and passed it along to Officer [REDACTED]. He actually called back a day later and indicated that he had figured out from the logs who [REDACTED] was the culprit, and that it would never happen again. It didn't happen again soon, but it has happened on a number of other occasions. Perhaps, that could be explained by a change of Commanders or new crews arriving at NAS Whidbey. I have no clue. However, I have been around enough aircraft that I can tell excessive, unnecessarily aggressive, or nearly reckless piloting at low altitudes from normal piloting.

In our experience of watching and monitoring FCLP's for 14 years from our Garden which is on waterfront property on the East side of Penn Code, [REDACTED] and I agree that most pilots fly basically the same track, but there are a few that do [REDACTED]. They prefer a longer track, or so it appears to us, to enable them to fly at a faster speed to seemingly make more noise than the others. Moreover, once the Pilots leave the confines of the OLFC closed loop flight paths and fly back to NAS Whidbey for fuel, food or rest, it is during the flights away from OLFC that some Pilots have fun flying Growlers in ways that seem not to be friendly to those of us who have no choice but to endure the "added" or "extra" noise, but rather oblivious people living below. That is a problem that, in our view, clearly demands attention and remedial action if not discipline. To us, it is unacceptable. It is our intention to begin keeping detailed information of Pilot activities when they occur, and to draw it to the attention of a Navy Commander, somewhere.

Another matter that, in our opinion is ripe for review and perhaps revision is as to flight tracks out of NAS Whidbey for EA-18G's that leave NAS Whidbey for other locations to undertake other, various forms of training and practice. It is a given that, if FCLP operations are undertaken at OLFC, some EA-18G's are going to come close by and make tremendous noise. It is less understandable why, when EA-18G's depart Ault Field for a flight out of the area of NAS Whidbey, such as flying over to Boardman, they mostly are directed by Whidbey Approach to fly directly over OLFC and the same houses burdened by the FCLP operations. Why cannot those departure and arrival flight paths or flight tracks be redrawn to avoid flying over the same homes. For example, many of the flights take the aircraft over or near Dugualla Bay after departure from NAS Whidbey and so the question arises, at least in my mind, why cannot a vector be established keeping the aircraft over the Saratoga Passageway at least until they reach a point that would intersect the line currently used that directs the aircraft to fly over OLFC. That difference is a difference of only 10-20 miles, but it would nearly silence one of the unnecessary sources of loud noise over the homes of people both to the north and to the south of OLFC. Isn't that a legitimate goal here? Can't we work to resolve some of the noise issues? How much measurable noise do these departure and arrival flight tracks generate, as for example, when they are ascending at full throttle or even with the assist of an after-burner?

I understand that flight tracks sometimes are negotiated between the Navy and the FAA, but we are not talking about major revisions. Just a little consideration for Civilians already burdened by FCLP noise, and favored by the Navy to have that FCLP noise increased by 575 percent.

Similarly, often the flight paths of planes descending on approach to NAS Whidbey take the planes directly overhead at altitudes of approximately 3-5,000 feet, and those too raise the question of why over the same houses already burdened with FCLP noise. I hope the Commander NAS Whidbey will undertake the task of reviewing and ultimately revising these flight patterns, consistent with an active, effective noise abatement program.

While I have not yet measured the noise generated (I promised myself to purchase a top-rated I-Phone application along with an omnidirectional microphone and tripod stand that will accurately measure decibel levels), by the flight patterns of EA-18Gs discussed in the previous two paragraphs, it is true that for some departures there are two, three or four EA-18G's grouped in a formation 30-45 seconds or so before arriving over my home. My estimation is that the noise event with three aircraft in a V-formation would approach 100 dB, even at an altitude of 1,000 to 3,000 feet. In other words, it is noisy noisy and some of that noise could be eliminated, minimized, or otherwise dealt with, if there is the will to do so on the part of the Navy.

Another area in which the Navy has made an impact is in regard to the ability of Civilians to make timely input and engage in a dialog with those various Navy personnel. When [REDACTED] and I first arrived on Whidbey Island in 2002, we made no phone calls and sent no emails o [REDACTED] ters

of any kind. We had zero contact. There was noise, but it was not unbearable. When we first began to notice what we considered to be extraordinary differences in Piloting, we contacted the Navy, as indicated above in the discussion about Pilots that have excessive flying tendencies. [REDACTED] the diplomat, made our point, received assurances that the matter would be handled and [REDACTED] were thankful for the opportunity to assist in the resolution of a “growing” problem. Fast forward a few years to the present. We can still call the “hotline” or the “complaint” line, but are fully unable to talk to anything other than a machine. Usually, the machine doesn’t call back. At the public scoping meeting, this was a matter brought to the attention of Captain Moore and a couple of the other Officers present and each was adamant in defense of the present system. So much for having a dialog. One Officer defended the current system on the basis that the person or persons who formerly answered the phone took horrible abuse with inexcusable language, and that those persons needed to be insulated from the abuse. So, if I understand this correctly, it is the position of Commander NAS Whidbey that all the citizens of Whidbey Island (probably most of whom live in the vicinity of the OLF) are denied use of real-time “dialog” in order to insulate a person or two from taking phone calls and dealing directly with people who are verbally abusive. Moreover, the “abuse” is not a one-sided argument. Consider “abuse” from the perspective of a person living beneath a Growler being flown by a Pilot who doesn’t care, or with a crewmate who repeatedly destroys civilian electronic equipment (see Section 5, Electronic Warfare Against one Citizen?, My Comments).

Here are examples we encountered, using the present system. We found a quotation in the December 23, 2013, edition of the Seattle Times that we wanted to use in the preparation of our comments regarding the DEIS. The article, however, is on the Internet and there is no source information included. Because the quotation was of a Navy spokesperson, we contacted the Community Planning Liaison person at NAS Whidbey, [REDACTED] by phone and actually talked to her and asked if she would determine the identity of the source. She replied by email, which reads: “This link will take you to the document. <http://whidbeyeis.com/CurrentEISDocuments.aspx>.” That, sadly, is a direction to look at the Title Page of the entire DEIS pending before the public. Isn’t that a 1,500 page document? In any event, the quotation could not be found in the document to which Mr. [REDACTED] referred us to. Three days later, on December 16, [REDACTED] called, talked to The Machine, and asked for a more exact reference, based on the suspicion that [REDACTED] must have located the source of the quotation (otherwise she would not have referred us to a 1,500 page document) but neglected to give us the exact location within the document.

Following that, [REDACTED] went to talk about another matter with the Island County Commissioner Helen Price-Johnson, who was out of her office at the time, but [REDACTED] nonetheless spoke with one Secretary in Commissioner Price-Johnson’s office, who voluntarily undertook to contact [REDACTED] regarding the quotation in question. On December 19, a Monday, [REDACTED] following message from Ms. [REDACTED]: “The following link will take you to the document. http://www.cnichnavy.mil/content/cnic/cnic_hq/regions/cnrnw/installations/nas_whidbey_island/om/environmental_support/jcr_content/par1/pdfdownload_1/file.res/NAS%20Whidbey%20Island%20AICUZ.pdf. A little explication would have been appreciated. The way our legitimate inquiry was handled effectively sent us a message, whether intended or not: I don’t want a dialog and do not bother me. At least, that new referral was to a shorter document - 190 pages.

A couple of hours later, the Secretary to Commissioner Helen Price-Johnson also sent by email the identical link, but also specified which of the 190 pages in the AICUZ Study the quotation could be found, by saying: “Attached is a link to the 2005 AICUZ Study. The information you are requesting is in the tables on 3-4 to 3-7. Table 3-1 shows the historical flight operations and Table 3-3 next to the last line shows the 6,120 operations at OLF[C] that were projected. I used the Secretary’s information and quickly found the information we had been seeking.

There is a lot of work to do. Or so it seems, to me.

Lastly, I will say that I have never met either Captain Moore or his predecessor, retired Captain Nortier. But before I even knew there had been a change of command, I mentioned to [REDACTED] that maybe there was a new Commander somewhere in the Navy hierarchy because the number of "gentlemanly" Growler pilots seemingly had increased and the other side had decreased. Obviously, I have no inside information, but the difference is appreciated. But the overall noise still remains bad.

SECTION 18.**THE NAVY'S DRAFT ENVIRONMENTAL
IMPACT STATEMENT IS NOT AN OBJECTIVE DOCUMENT**

As indicated in Section 1, Congress declared that "it is the continuing policy of the Federal Government . . . to use all practicable means and measures . . . in a manner calculated to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." NEPA further "declares that it is the continuing responsibility of the Federal Government [of which the Navy is a part], to improve and coordinate Federal plans . . . and programs to the end that the Nation may . . . assure for all Americans safe, healthful, productive and esthetically and culturally pleasing surroundings; attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences . . . and achieve a balance between populations and resource use which will permit high standards of living and a wide sharing of life's amenities. . . ." Finally, the Congress recognized and stated that "each person should enjoy a healthful environment and that each person [including military personnel] has a responsibility to contribute to the preservation and enhancement of the environment."

It is my strong belief that the Navy has disregarded these policy declarations of Congress and instead of acting consistent with the NEPA, unilaterally seeks to impose upon the Americans who live in Coupeville and its Environs, a real-life environment that includes terror-by-noise generated by EA-18G Growlers, and for the future proposes to increase the duration of those noise levels, as reflected in the number of proposed FCLP operations, by as much as 575 percent to levels devoid of conscience or concern. There is virtually no acknowledgement in the analyses in the DEIS of either the mandates or the policies of NEPA or any expressed concern for the civilians burdened beyond belief by what, in my opinion, amounts to a unilateral abuse of power by the Navy. Instead, the DEIS would make it possible for the Navy to defy reality and reach a false and untrue conclusion that even by increasing present noise-terror by 575 percent would entail "No Significant Impact" upon fetuses, babies, children, pregnant mothers, elderly people, indeed any human. How, you might ask? Because the Navy has "managed" and directed the data that is included in the DEIS, and the Navy will be the prosecutor, judge and jury in reaching a decision of "No Significant Impact" so that the Navy can then do what it wishes to do, accompanied by an apparent civilians-be-damned attitude, as to the Town of Coupeville and its Environs.

Those are strong words, but in essence there is a similar record reflected by Navy leadership in reaching conclusions and decisions of "No Significant Impact" in countless other episodes.

This has nothing to do with the highly professional and effective manner in which the Navy has performed the Navy's mission, sometimes in exceedingly difficult circumstances. But it does seem to be a feature in several scandals involving Navy personnel over the years, although I have no need to discuss those, other than to wonder whether Navy culture is what it should be, and I have no way to assess that.

A relatively painstaking review of some of the Navy's use of statistical information hopefully, for the reader of this Section of My Comments, will shed the light of day upon some of the data used by the Navy to facilitate a "No Significant Impact" conclusion which is the ultimate Navy

goal. Why without question? Because the Navy chose to use a computer-generated modeling program instead of obtaining actual data as the metric by which to gage Growler noise, or to otherwise verify the data used, or by failing to provide documentation that indeed there exist health issues in their proposals.

The metric, known as a modeling metric, the DNL, which includes the quiet time in a typical 24-hour period of time in a 365-day year in calculating the level of noise resulting from Growler light operations is what is used, but unverified. It does not provide a real-life level of noise exposure. That same computer-generated modeling program could be "set" so that it is limited to flying days and further limited to flying hours in a flying day to better gage the intensity during a flying day of Growler noise as well as the duration of that noise. That could be accomplished in addition to using the present method for some legitimate purposes. Typically, the DNL system is widely utilized and accepted to predict public annoyance with noise environments, and in assessing land developments plans for communities, but not for understanding a narrative about health issues caused by high levels of noise.

The DEIS contains a "No Action Alternative" that would continue the practice of flying 6,100 FLCF operations per year at OLFC and 14,700 at Ault Field, for a total of 20,800 per year. In essence, if selected, the "No Action Alternative" would constitute a continuation of the status quo. It should be noted the the current flight level at 6,100 at OLFC was never a proposal that received full vetting under NEPA or that was the focus of a DEIS.

In documents obtained pursuant to the federal Freedom of Information Act, the Navy has determined that at OLFC there are typically 40-50 flying days per year during which FLCF operations are performed. Assuming that there actually are 45, that would translate into a per-flying day average of 1/45th of the 6,100 FLCF operations performed at OLFC per year. That yields a per-day number of 135 (6100 FLCF's divided by 45 flying days). If the number of flying days per year is 40, the FLCF average per day would be 152½. Most POI's used by the computer modeling program would receive less than that amount. The reason is that at OLFC there is but one landing strip, but there are two runways that are used, primarily dependent upon wind direction as well as the length and width of FLCF Flight Tracks. Normally, landings are executed into a headwind, if available, and take-offs seldom are executed with a tail wind if reasonably avoidable, for safety reasons. Admirals Drive, for example, receives most noise when Runway 32 is used for landings, up to 70 % of all FLCF operations, because of safety issues with Runway 14 relating to the Growler flight capabilities and because of prevailing wind patterns.

Each FLCF operation counts as two flights (one for a landing approach leading to a "Touch" and one for the "Go" which is an accelerated, powered take-off in lieu of a full stop. The Touch is noisy because of a powered landing approach leading to a "Touch" and the "Take-Off is noisy because the aircraft must employ tremendous thrust to obtain appropriate velocity to propel the aircraft to a safe altitude and on to another FLCF with no stop between FLCFs during a "session" that may include as many as five Growlers flying the same flight track during a session. Lots of noise that the DEIS characterizes as "intermittent." While the term "intermittent" makes sense in the context of flying days in a month or year, it makes no sense in the context of Growler noise analysis during a Session of multiple Growlers, but rather is misleading and deceptive, and gives a false impression that belies the reality that there is substantial noise preceding, for example, the arrival of a Growler directly overhead and for a period of time thereafter as the Growler flies on toward another sometimes seemingly unending parade of Growlers flying FLCF loops or tracks that on paper look every bit like a racetrack for horses or cars. When multiple Growlers are flying the same loop (the Navy says no more than

five should fly the same loop in a session), it is more accurate and precise to use the term “intermittent” to describe the presence of “silence” (my term) during a session. Human recovery from living below FCLP flight paths normally could be expected to require a longer “intermission” than what normally is available when FCLP’s are flown by four or five Growlers in four continuous sessions, interrupted only by the need for more aviation fuel and food, or rest for any particular pilot.

Further, a POI at the end of a Runway (32 for example) would receive noise from a “Touch” because of the associated powered landing approach, but not quite as much noise from a “Go” which could be expected to generate noise at the other end of the landing strip (Runway 14), and the noise would vary depending upon the flight track undertaken. The longer the flight track, the more homes there are that would be impacted by noise at OLFC. That noise does not enter into the data utilized by the Navy in the preparation of the DEIS. However, in calculating the very biased DNL calculations, the “relative quiet” of night time is included in their calculations. Yes, DNL calculations, based upon decibel levels includes projected nighttime noise levels (i.e. noise while sleeping) in making those 24-hour averages. In analyzing noise, where the DEIS proposes increasing FCLP operations by up to 575 percent over civilian-only neighborhoods). Thus, for the Admirals Drive POI, the humans living nearby are currently subjected to Growler noise 70% of Touches (70% of 3,050 Touches which would be 2135). If that number of “touches” is divided by an average of 45 flying days per year the Admirals Drive POI would get “touches” at the rate 47.4 per flying day). It also would get noise from take-offs but to a lesser extent because of the attenuation factor of distance from the noise source. Actual measurements could and should be used to determine precisely the amount in both cases. What is important to citizens who live at Admirals Drive is the total dose of noise per FCLP in order to determine whether the total exposure during a single FCLP, or the combined total for all of the FCLPs in each session for each Flying Day exceeds the noise exposure limits set by OSHA and NIOSH (see Section 8., DNL, NIOSH & OSHA, My Comments).

Further, most anyone who lives in the vicinity of the OLFC and who possesses an elementary understanding of which flights involve FCLP’s and which reflect overflights involving Growlers taking off or landing relative to training or other business conducted other than for FCLP operations at OLFC, or for arrival or departure from OLFC, and in instances in which 4 Growler aircraft in in FCLP flight tracks and where there are, say, 4 FCLP sessions in one flying day, the number of noise episodes likely will exceed 47 per day. The only sure way to measure noise at any POI from all FCLPs, from FCLP associated flights to and from Ault Field, from Growler flights from and to Ault Field involving an overflight of the area around OLFC, and from other aircraft such as helicopters and occasional use of OLFC by other Navy aircraft such as F-18E/F’s or other Navy aircraft is to use actual equipment to measure such noise. Not a modeling program written for a computer-generated program that is limited by the particular parameters concocted for a DEIS, and designed to facilitate and support a finding and decision of “No Significant impact”. The DEIS makes no noise projections regarding any flights emitting noise at the communities surrounding OLFC other than FCLP’s although there are a huge number of those, and apparently more are coming from at least three dozen additional Growlers due to be assigned to NAS Whidbey. Aside from FCLP’s, none of that noise is calculated for a noise exposure to OLFC communities, but seem to be factored into calculations for Ault Field because they are referred to in DEIS in the context of Ault Field.

In contrast to Admirals Drive, the POI of Race Lagoon, which is situated to the east of the center point between Runway 14 and 32 of the landing strip at OLFC and which, therefore, receives noise from both powered landing “Touches” and full-powered take-off “Go’s”, and thus would be subjected to noise from all 6,100 FCLP operations per year, which would amount to about

1/45th of 6,100 FCLP operations to arrive at a per flying day number of Growler-flight noise of 135 or 136. I believe the modeling data does not attribute noise to any POI greater than 50%, because it assumes a split of 50/50 for each of Runway 14 and of 32, and not a full 100% for any POI that receives noise from both, like Race Lagoon.

In addition, if actual monitoring equipment had been used, and the data had been recorded, that record would reveal that, for many locations, including my residence at the North end of Runway 14, at a waterfront location on the south side of Penn Cove, even when Runway 32 is used for the "Go" portion of a FCLP, high levels of noise over my home is generated by a Growler while it is executing a relatively tight left turn to the west (sometimes directly overhead, as when a pilot wanders away from a patterned and prescribed track) in preparation for executing another FCLP utilizing Runway 32 and the accompanying flight loop, and is very similar to the intensity and duration of noise generated over my home when a Growler is on approach to a powered landing "Touch" when Runway 14 is being utilized. A separate Table is in the DEIS for each of Scenarios A, B, and C for each of Alternatives 1, 2, and 3 and for the "no Action Alternative."

To accentuate the decidedly wrong assessment for a comparison between the respective Admirals Drive and Race Lagoon POI's, Table 4.2.11 says that for Admirals Drive there will be a maximum sound exposure level of 118 and a level of 114 for Race Lagoon, and those numbers are projected by the modeling program to increase (without explanation) to 121 and 115, for those two POI's. Then, to prove my point, the "number of Annual Events" during which the maximum is projected to be a fact of life for Admirals Drive is 267, and for Race Lagoon is 55, if the "No Action Alternative is selected (See Table 4.2-3). Horrifically, if Alternative 1, Scenario A is selected, the numbers increase bigly for Admirals Drive to 2,650 and to 515 for Race Lagoon. Those numbers are not explained and seem to defy gravity in favor of numbers floating somewhere in the clouds. It is but one of hundreds of examples where simplicity for the sake of ease of understanding has suffered in favor of confounding, under-stated, and unexplained pages and tables that comprise the DEIS. For my purposes it is an example of why the DEIS is unreliable and, in my opinion, designed to facilitate a finding of "No Significant Impact" for whichever of the 10 proposals the Navy wishes to impose upon the civilian communities that surround OLFC.

Civilians living near OLFC likely will be subjected to horrific levels of noise, that may well be in excess of the federal noise limits established by the NIOSH and OSHA dose limits, considering all of the FCLP operations during which each of those POI's, and other non-projected locations, will be subjected to dangerous levels of noise. For Admirals Drive, under Alternative 2, Scenario A, (for example), that number likely would be 70% of all FCLP's anticipated by Alternative 2 which would be 70% of the "Touch" portion of 33,600 FCLP's, which is 70 percent of half of the total number of FCLPs, which is 11760; and for Race Lagoon it could well be 100% of all 33,600 FCLP operations. For Race Lagoon, the number per flying day of Growler noise during FCLPs would be 1/45th (assuming FCLPs are performed 45 flying days per year) of 33,600 = 672 per day, which is ridiculous. To reduce that number to the current level of overflights per day would require the number of flying days per year to be increased significantly to accommodate the number of FCLP operations projected.

I point out that Table 4.2-3 "posts" the number of FCLP's under each of the 4 Alternatives of No Action, Alternative 1A, B, and C. The Alternative and Scenario having the greatest impact on OLFC is Alternative 1, Scenario A. For Race Lagoon, the projected number of times in the year in which the maximum noise would occur is 515, and for Admirals Drive, it is 2,650. What accounts for this difference is unexplained. Even at the POI of Snee-Oosh-Point Which is not

even on Whidbey Island but rather is on Fidalgo Island, the number is 1,033. Race Lagoon is on the Flight Tracks for both OLFC Runway 14 and Runway 32 (opposite ends of the same landing strip at OLFC). Snee-Oosh-Point is not on any runway for either OLFC or Ault Field, so obviously something other than FCLP's are being calculated. Even when FCLP's are performed at Ault Field, the number for Snee-Oosh-Point is less than 1,033 (918). Seems to defy reality. Those numbers, as explained in the narrative preceding Table 4.2-3 is to show "the number of events that would produce the **maximum**" noise exposure expressed in SEL L-max decibels, on a per-day average for the entire year. The maximum exposure level for Admirals Drive, according to that narrative, is "an average of approximately seven times per day. That calculation is made by dividing 2,650 by the number of days in a year (365). 2,650 divided by 365 = 7.26. For Race Lagoon it would be 515 divided by 365 = 1.41. For Snee-Oosh-Point, it would be 1,033 divided by 365 = 2.83. Consider this, for a moment. When the vast majority of FCLP's are performed at OLFC, a place on Fidalgo Island gets more noise. Hard to believe, but take a look at Table 4.2-3.

Including this category of numbers in the DEIS may have a reasonable use, but a consideration of the average amount of noise exposure to civilians living below OLFC-based FCLP's, for purposes of determining the extent to which the Navy is proposing to subject Civilians who live in Coupeville and its Environs, is not one of them. Why? Because under Alternative 1, Scenario A, the DEIS is proposing that 35,100 FCLP's will be flown at OLFC. While Table 4.2-3 tells us how many times the Navy's projections of noise will be at the maximum of 114 L-max Decibels, it only tells us about 2,650 of the FCLP's. It tells us nothing about the other humongous number of FCLP's. That number, if Admirals Drive gets 50% of the FCLP's, would be 35,100 divided by 2 = 17,550 FCLP's (calculation for number of "touches"). 17,550 less 2,650 = 14,900 that may be at a decibel level of 117.4, or 117, or 116 decibels, or whatever. None of them would be stealthy and silent. All 14,900 have to be included in calculating the total exposure for Civilians who live at the Admirals Drive and Byrd Drive POI. The same thing, basically for Race Lagoon, except they would get a longer dose of noise, perhaps, than Admirals Drive because it is close to the side of the landing strip rather than at an end of the landing strip at OLFC.

Two other tables that are insightful, at least in the context of the lack of objectivity in the DEIS, is Table 4-7 and Table 4-8. Those tables purport to indicate for each of the POI's the average indoor nightly awakening by Growler noise and the average daily indoor daytime per hour speech interference from Growler noise, measured in terms of the "Average Year Baseline" scenario. Let's compare the numbers for Ault Field and OLFC by looking at the most susceptible in each category. At first glance, the reader is inclined to compare Sullivan Road (near Ault Field) with Admirals Drive (near OLFC), and say "Wow, Sullivan Road really has it bad. Remember also that proximity to the noise source is a factor when determining the intensity of noise. Presently, for the Sullivan Road POI and for the Admirals Drive POI, the respective DNL's are claimed by the Navy to be 90 and 79, based on the Navy's computer projections (see Table 5-5). The maximum Sound Exposure Levels for those two respective POI's are 121 and 118 (see, for example, Table 4.2-11). The DEIS also claims that 3 decibels are hardly perceptible. In other documents, like NIOSH documents, 3 dB represents a doubling of noise, measured by decibels. The difference in DNL's may be explainable in terms of total traffic, but not all aircraft traffic is counted for any POI near OLFC, while it is counted or considered or factored into the DNL computer projections. In any event, Table 4-7 shows that, for example, the Annual Average Nightly Probability of Awakening if you live on Sullivan Road is 68%. If you average "up" that would mean **100% of the three registered voters who live on Sullivan Road** would be awakened nightly (see [Voter Records](#), Sullivan Road, Oak Harbor, WA). Given that the civilians who live near Admirals Drive and Byrd Drive (the full address of

the POI at OLFC) is in a community with more than 400 homes, and is directly below low-level landing approaches at OLFC when Runway 14 is used, and has a peak Maximum Sound Level of of 118 under the current level of flights at OLFC), **it is difficult to have confidence in the Navy's claim that only 13% of those residents would be awakened nightly**. Similarly, under Table 4-8, the Annual Average Daily Indoor Daytime events per hour in which there will be **Indoor Speech Interference for Sullivan Road is claimed to be 10 and for Admirals Drive it is one**. **These numbers are astonishing when you consider that Growler Noise, for example, drowns out the audio on movies, or football or basketball games every single time a Growler flies by while entering or exiting a FCLP, while departing Ault Field or arriving at Ault Field and while flying directly over OLFC, as well as for each FCLP operation involving, for Admirals Drive, at least half of 6,100 or half of 35,100 FCLPs projected to be flown at OLFC by Alternative 1, Scenario A.**

These numbers, as indicated above, are "astonishing" because they are flatly and fully unbelievable. Further, as I indicated elsewhere in My Comments, the selection of POI locations are not identical in terms of selection criteria. My best guess is that the Navy played a role in the selection, on the basis that they "feed" the data to Wyle Laboratories.

The point I am making is that the data in the DEIS is both unreliable, incomplete, and biased. Further, usually in the highly technical world, it is ordinary to include nearly unending detail regarding data and details. For example, you can find online at least two instances in which the United States Air Force utilized a software program called NoiseCheck to check the accuracy of projections made by NoiseMap. The NoiseCheck data is included with the report indicating where the NoiseMap data was in conflict with the NoiseCheck data.

The NoiseCheck report found deviations and the report in that regard contained pages of data so that others could check the work and calculations. In the context of the preparation of the DEIS under consideration with reference to Growlers at Whidbey in the here and now, we have very little evidence regarding the data fed for NoiseMap purposes by the Navy to Wyle Laboratories. Or how many times did the Navy change the data provided to Wyle Laboratories, or was it ever changed by Wyle Laboratories. But it is disconcerting that some numbers relative to comparative noise made by Prowlers and Growlers is different in this DEIS now than before. Prowlers somehow became noisier over time and Growlers became somewhat quieter in some categories of comparison. No explanation is given, which doesn't assist in building confidence.

I now turn to facts derived from the Internet, including the Navy's own websites. I was literally stunned and shocked to learn that the Veterans' Administration has expended the enormous sum of **\$6,048,000,000 for Disability Benefits paid for hearing loss as the Primary Disability** between 1968 and 2006. Moreover, Navy's graph is a strong visual depiction showing the exponential rate of increase in disability payments for hearing loss between 2000 and 2006 (See Chart attached to this Section, provided by the Naval Safety Center, NAVSAFECEN). Keeping in mind that 2006 was an entire decade in the past, it is reasonable to conclude that the exponential rate of increase continued to even more mind-boggling numbers that presently are unreported and unknown to the general public. I also point out that the headline to the chart provided by the Navy is "**STEPS MUST BE TAKEN TO REVERSE THE TREND**". Putting those numbers into context, there apparently are only about 107,000 sailors living and working aboard U. S. Navy ships, but noise is a fact of everyday life in the Navy, even for Navy personnel assigned to shore duty at NAS Whidbey. The final point is to state the obvious, that a civilian who lives in the vicinity of OLFC and is subjected to the noise levels imposed by low-level Growler flights engaged in FCLP operations as well as overflights over OLFC of Growlers, does not have the same recourse of seeking disability payments for

Growler noise, in the event of hearing loss, as either military personnel or civilian personnel employed at NAS Whidbey. We are on our own. That is why it is impossible for me to understand why the Navy stubbornly adheres to the ways of the past, in using a modeling computer forecast to understate the noise problem for the apparent sake of reaching the "easy" decision of "No Significant Impact." It is foreseeable that lawsuits for hearing loss, as well as other physical and mental consequences (perhaps similar to those consequences the formed the basis of lawsuits in Japan resulting in many millions of dollars in damages awarded to the plaintiffs) will be laid at the feet of Navy leadership in the not too distant future. I, along with many of the Navy Veterans who receive disability benefits for hearing loss, am living proof that it doesn't take 40 years, as claimed repeatedly in the DEIS, at present levels of exposure (as said to be the case by the Navy in the DEIS). I have only been exposed to Prowler and Growler noise for 13 years and my hearing has suffered quite a bit. I'm guessing somewhere between 30 - 40 %. Just ask my spouse, [REDACTED] What? While I might have sought protection earlier, was it ok for me to rely upon the Navy's claim that it was safe to be outside in my garden everyday and not worry about hearing loss?

Even if "Noise Terror" is not a fundamental purpose in planning, purchasing, and utilizing increasingly louder and more dangerous aircraft, there is that aspect of Growler-generated noise. That is to say, if "Terror" is a purpose and function of Growler-generated noise, the people who are subjected to that noise terror the most are the Americans who live in the vicinity of a landing strip such as OLFC, or NAS Whidbey, or any other NAS where FCLP's are performed for EA-18G's and F-18E/F's. The number of flights over enemy territory anywhere in the world today, or anywhere since EA-18G's became operational, does not mathematically compare to the number of flights over the homes of people who live where FCLPs are performed and executed, as in the case of OLFC.

Isn't it time for the Navy to admit that it cannot even stop Growler pilots and crews from choosing to live, for example, in Anacortes, Washington, which is not even in the same county as NAS Whidbey or OLFC, as a means to escape FCLP noise. Indeed, of the Six Navy representatives in attendance at the Coupeville scoping meeting in December 2016 regarding the DEIS this question was posed to all but the Base Commander : "Do you live near OLFC or on NAS Whidbey." The answer was a resounding "No" from each person. One person was from Virginia, and indicated a preference to having a 1½ hour long commute in each direction to live away from FCLP noise. The reasons may be varied, but it isn't a stretch of credulity to declare that living near a place like OLFC would be absolutely intolerable for most families of military personnel. The reasons why so many people chose to live near OLFC relate more to a failing of both the Navy and local government officials to apprise people of the full extent and intensity of noise levels inherent upon living close to OLFC. That is to say, the "warnings" and disclosures provided were not adequate, accurate, or clear. In any situation, it is apparent that the Navy, the county government and the real estate brokers/agents all had a hand in diluting the disclosures made to Civilians who bought homes near OLFC in the last 15-20 years. In the OLFC vicinity, it is accurate to say that if there had been a conspiracy between the Navy, Local Governments, and the Real Estate Brokers and Agents who were involved with selling lots and homes near OLFC in one capacity or more, the design of the warnings and disclosures provided at the time I purchased my lot in 2001 would have been a very good model or technique for understating and providing misinformation to delude and fool people into buying property in that vicinity. I believe the courts would look carefully before "sticking-it-to" the civilians adversely damaged and impacted by that scenario. The relative equities are clear and apparent. Further, there is another full-fledged choice - that of the Navy finding a new OLF that will not threaten the health, physical and mental, as well as relative wealth of civilians. If the Navy would do that, or

be required to do that, the issue would be resolved. **A new NAS is unnecessary. A new OLF is essential.**

A 2009 document prepared by the Naval Research Advisory Committee and obtained from a Naval online source (www.NRAC.Navy.Mil/docs/2009_Executive_Summary.pdf) addresses the Navy's dramatic degree of inaction on jet engine noise problems, and states as follows:

"An overarching finding of this study is the paucity of engineering quality data. Standardized engine noise data to compare the engine noise among different aircraft or among various engines do not exist, and the available data do not correlate Sailor or Marine hearing loss with their respective noise exposure environments. Also standards do not exist for acquiring engine noise data for tactical aircraft. . . Approximately 28% of the VA hearing loss claims are for the Department of the Navy, but data does not exist on the environment that caused the hearing loss. . . ."

"Although the noise levels of commercial jet airliners have been decreasing, the noise levels of tactical jet aircraft have not. In all likelihood, tactical jet noise levels have increased as the velocity and airflow from these engines have increased to produce added thrust. . . . The Navy has not routinely measured aircraft noise and does not maintain a data base of the noise levels of its aircraft. There has never been a requirement for a maximum noise level in military aircraft, and today the Department of Defense does not have adequate understanding of supersonic jet engine noise to establish a realistic maximum noise requirement." [Solutions to noise problems] "will require finding ways to limit the exposure of . . . personnel to areas of high noise. It will require the development of better procedures to monitor the noise exposure and hearing loss of personnel. It will require further development of noise abatement procedures to minimize the noise footprint around Naval . . . Air Stations. And finally, it will require more research into the physiological effects of the full spectrum of noise - including low frequency pressure levels."

It is a fact that while one Growler costs in the vicinity of 85-100 million dollars, the Navy between 2003 and 2009, over a 7-year period, spent only \$15 million dollars on noise reduction investments even in the face of an exponentially increasing amount expended on noise-related military disability benefits. Moreover, it is possible that the Navy could seek funding to replace the EA-18G, which is built on the F-18E/F frame, with an iteration of the F-35, which has louder noise parameters than the EA-18G.

Further, even the NRAC, as well as the International Medical Community (including the medical community in the United States, has expressed alarming concerns about the adverse impact of **low frequency sound pressures** on hearing and internal organs, the sustained exposure of noise of all kinds upon learning and cognition, and situational awareness involving sound. The International Journal of Occupational Medicine and Environmental Health (2005; 18(2): 185-198) stated a simple but alarming warning as a conclusion to its study of whether exposure to **low frequency noise**, as emitted for example by the Growler, can influence mental performance as follows: These findings suggest that LFN [Low Frequency Noise] at moderate levels might adversely affect visual functions, concentration, continuous and selective attentions, especially in the high-sensitive to LFN subjects." It is unacceptable that the biases in the DEIS suggest strongly that the Navy seems content to sweep hearing and health issues under the proverbial rug instead of addressing the issues of continuing to use OLFC as if it was situated on a desolate island far from any human, child, or other living thing. We all deserve better.

A lengthy search of data in the DEIS does not reveal any analysis of the impact upon the civilians who live in the vicinity of OLFC of levels of noise for that many FCLP's, or the economic

impact that will put at risk the economy and lifestyle of Coupeville, which was intact since about 1881, or the risk to the geographical stability of the treasured Bluff's on Whidbey Island (see Sec 11, Vibrations and Concussive Sound Waves: Effects of Thousands of Repeated EA-18G "Growler" Flights on the Bluffs of Whidbey Island, My Comments).

I cannot point to any consideration in the DEIS other than the Navy's wholehearted support to itself and its positions, by taking a singular tack. There is no objective consideration, mandated by Federal Law that is NEPA, to provide balanced, objective analysis of both the Navy position and the clear position of Coupeville, its Environs, and the legitimate concerns of Civilians who live below the noise terror of the Growlers. The absolute silence with which the Navy blithely ignores the possibility of a better situation than they presently have at OLFC, including a permanent end to the bad feelings that exist on both sides of this Navy-created mess, is not silence but a loud Growler-like roar that the Navy will not even attempt to remove itself from the noise mess it has created by continuing to use a temporary landing strip and pretend it is something more akin to LAX. I understand the Navy's position and believe it is nothing more than an extraordinarily selfish act preferred, regardless of the impact upon the economy of Coupeville, or upon the home values, health, and ability to live an enjoyable life without Growler noise terror (See Section 3, Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy; and Section 4, DEIS Economic Benefits to Coupeville & Environs Means Negative Impact Burdens, My Comments). Not even once in 14 years have I seen a Navy vehicle in my neighborhood during the times FCLP operations are performed or at any other time for any purpose, much less to monitor FCLP's from the eyes of a person who lives near OLFC).

Sometimes, I get the feeling that in writing DEIS' the Navy instead of following the mandates of NEPA engages in Information Warfare and Deception. Maybe it is time to revisit NEPA and the Navy's apparent vision and unchecked performance.

18

Environmental Consequences

4-30

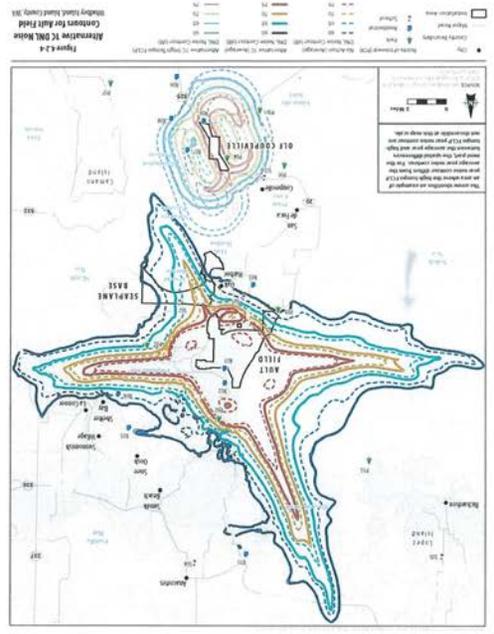


Figure 4-2-4 Alternative 1C DNL Noise Contours for Adult Field

February 15, 2017

EA-18G Growler EIS Project Manager
 Naval Facilities Engineering Command Atlantic
 6506 Hampton Blvd.
 Norfolk, VA 23508

Attn: Code EV21/SS

To the Project Manager

Enclosed are my public comments for the U. S. Navy Draft Environmental Impact Statement (EIS) for EA-18G More Aircraft Operations at Naval Air Station Whidbey Island Complex.

They are being submitted within the time line extended.

I hope you enjoy reading them.

I am able to send you a digital copy through email, either in Pages, Pdf, Docx, or Word format, upon request therefor. Have a great day!!

Sincerely,



Coupeville, WA 98239

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.p. Local Differences in Economy
- 16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)
- 19.d. Electronic Warfare
- 19.f. Outlying Landing Field Coupeville Security Blocks
- 2.a. Purpose and Need
- 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.k. Range of Alternatives
- 2.l. No Action 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
- 3.e. Field Carrier Landing Practice Patterns
- 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.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 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
- 4.t. Noise Mitigation
- 7.a. Regional Land Use and Community Character
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.g. Mapping and location of Ebey's Landing National Historical Reserve and Central Whidbey Island Historic District

PUBLIC COMMENTS
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT,
PREPARED IN 2016 BY THE UNITED STATES NAVY,
FOR THE EA-18G “GROWLER” AIRCRAFT OPERATIONS AT
AULT FIELD AND AT OUTLYING LANDING FIELD-COUCPEVILLE, WA

The public comments were prepared by

██████████

February 12, 2017

FOREWORD

Each of the 18 Sections comprising My Comments are a direct result of the experiences of living for 14 years beneath thousands upon thousands of Prowler and Growler FCLP flights at OLFC, listening to the roar of Arrival and Departure flights executed while Navy Aircraft have entered or exited from the closed-loop pattern of flying while engaged in FCLP operations, and listening to the over-flights of aircraft departing or arriving at Ault Field in connection with flights at higher altitudes than those involved with FCLP's; (2) while attending the public scoping meeting held in Coupeville in December 2016; and (3) spending well over one month attempting to read, comprehend, and understand the DEIS' 1,500 or so pages, and (4) reacting to the request for public comments by the Navy, and writing these comments.

My Comments reflect having lost most of the respect that I had gained throughout my adult life, which includes having been being stationed two years at NAS Jacksonville as an Officer in the United States Air Force, growing up with my own individualized Ivory Tower, and having enjoyed the last 14 years flying with my best friend around the Pacific Northwest in a Pilatus PC-12, Bell Jet Ranger Helicopter, and an amphibious de Havilland "Beaver." It is safe to say that I have a love of flying. Nonetheless, I have attempted to put my "emotions" aside and deal with reality as experienced and viewed in the context of my experience of living on Kineth Point, which lies midway between Long Point and Snakelum Point on Whidbey Island near Outlying Landing Field Coupeville (OLFC).

I have not been involved with any group or organization in any respect on Whidbey Island, other than being a supporter of Meerkerk Rhododendron Gardens near Greenbank, and the Whidbey Island Chapter of the American Rhododendron Society. During our time on Whidbey Island, we have transformed an undeveloped lot into one of the finest Gardens on Whidbey Island. Last year, we were one of the host gardens for the Whidbey Island Garden Tour, and approximately 650 people visited our garden during a six-hour window. Our Garden was planned and developed with self-help and we have spent possibly more time than anyone in our backyard, during all of our year on Whidbey. That is important because we gained a great deal of information watching, listening and becoming aware of FCLP flights, pilot idiosyncrasies and tendencies, and altitudes of close-in flying.

I regret that on occasion the "tone" in My Comments is a bit direct, or sharp, or one of frustration, but if the Navy is offended, it is the Navy's fault. Too often I have learned that communication with the Navy leaders has been one-way. The Navy does not listen well. Maybe that is a derivation of Command located other than at and higher than Whidbey NAS. Whatever the case may be, it's time for a change. I hope the Navy can hear my voice and attempt to understand the reasoning in these, My Comments.

Permission to use any portion of My Comments for any purpose will be accorded appropriate consideration, and written permission may be granted upon request therefor sent to [REDACTED], Coupeville, WA 98239.

February 12, 2017

TABLE OF CONTENTS

This document (My Comments) was prepared in response to the Invitation for Public Comments on the Draft Environment Impact Statement (DEIS) for EA-18G "Growler" operations at NAS Whidbey Island Complex, with primary focus upon the continued use of OLF Coupeville (OLFC) as it relates to Coupeville and the Civilian Communities surrounding OLFC.

For convenience to the reader, My Comments are segmented and compartmentalized by subject matter and are referred to as Sections. Each section, thus, is separate and distinct. The Sections contain the following subjects:

- Section 1. ***NEPA: The Federal National Environmental Policy Act of 1969 and the United States Navy***
- Section 2. ***DNL and its Value.***
- Section 3. ***Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy?***
- Section 4. ***DEIS' Economic Benefits to Coupeville & Environs Means Negative Impact Burdens.***
- Section 5. ***Electronic Warfare Against One Individual? Whose Actions Caused Persistent Destruction Over Time of Electronic Equipment in my Home? A Documentary Accounting.***
- Section 6. ***Alternatives to OLF Coupeville.***
- Section 7. ***DEIS Bias: Benefits from NAS Whidbey.***
- Section 8. ***DNL, NIOSH, & OSHA: On Noise Exposure Doses.***
- Section 9. ***Noise Issues Involving Growler Flights.***
- Section 10. ***Growler Noise Levels: Impact on Hearing Health.***
- Section 11. ***Vibrations and Concussive Sound Waves: Effects of Thousands of Repeated EA-18G "Growler" Flights on the Bluffs of Whidbey island.***
- Section 12. ***Hearing Health Issues and Growlers, Until F-35's Arrive.***
- Section 13. ***Growler Noise and Community Health.***

Section 14. ***Navy Avigation Easements Near OLFC: A Bad Example of Navy Leadership and Community Interaction.***

Section 15. ***Noise Abatement.***

Section 16. ***The Navy, NEPA , and Predictable Findings of “No Significant Impact.”***

Section 17. ***“Issues” of Navy Leadership and Accountability.***

Section 18. ***The Navy’s Draft Environmental Impact Statement for the Growler is NOT an Objective Document.***

SECTION 1.**NEPA: THE FEDERAL NATIONAL ENVIRONMENTAL POLICY ACT OF 1969
AND THE UNITED STATES NAVY**

The federal National Environmental Policy Act of 1969, as amended (hereafter NEPA), declares "a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man". 942 U.S.C. 4321). The Navy and all branches of the Armed Forces of the United States are subject to NEPA, as are all federal agencies, including the Federal Aviation Administration, which governs civilian and commercial aircraft ventures and endeavors.

In the NEPA, the Congress further declared "that it is the continuing policy of the Federal Government, in cooperation with the State and Local governments, and other concerned public and private organizations, to use all practical means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." That policy is said to be in recognition by Congress of "the profound impact of man's activity on the interrelations of all components of the natural environment" . . . including "population growth" and "new expanding technological advances" . . . and "further recognizing the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man."

My reading of this law and the policy behind the law is that it is an attempt to impose upon entities such as the Navy the monumental administrative process to give due regard and respect to all persons or entities that have an interest in whatever the Navy is proposing. There are more interests involved in this DEIS than merely Navy interests and NEPA requires those interests to be given due regard and respect, but assumes that the Navy's proposals and self-analysis will be defensible in the light of other moral or legal requirements expressed in NEPA, as indicated above, and in the Constitution of the United States. In that regard, all laws of the United States and the States, as well as the process of administering or interpreting federal laws, are subject to the requirements of the United States Constitution. This includes the manner in which the United States Navy administers and applies federal laws, including NEPA. While the Navy certainly must give strong, unyielding attention to its mission and the welfare of the United States, it does not mean that there should be zero consideration by the Navy to alternative locations for the conduct of FCLP' operations conducted by NAS Whidbey, if conducting them at the two aircraft landing facilities available to and under the control of the Navy would run afoul of, or be contrary to, or in conflict with, the mandates of NEPA or the Federal Constitution. Especially, as here, when the Navy is proposing to increase the number of FCLP's per year at OLFC from 6,100 up to 35,100, a monstrous increase of up to 575%, not including any FCLP's that would occur if the Navy also contracts with foreign governments to train foreign pilots to land on aircraft carriers at OLFC. I point out, parenthetically, that the population of Whidbey Island already reflects the presence of at least 50 families of Canadian pilots, and there exists Navy news that dozens of Growlers have been purchased by Australia and that the training of those foreign pilots might well occur at OLFC as well. The Navy's

expectations, inherent in its DEIS, of imposing a catastrophic burden upon the economy and unique longterm lifestyle that is Coupeville and its environs (I note that Coupeville is the second oldest town in the State of Washington) is an absolutely unrealistic expectation on the part of the Navy. It also represents a direct violation of federal law and policy reflected by and in the NEPA, indeed, is an indictment of the lack of objectivity and the lack of consideration of and for the rights of citizens, as required by NEPA and the United States Constitution, as discussed elsewhere in My Comments.

Ask the Navy why they don't just add Navy Officer housing on Navy lands around OLFC and make that housing available or mandatory to Growler Pilots and their families. One answer is that that would be silly because there presently are no Navy Pilots or their families who have chosen to live anywhere close to OLFC. Indeed, each of the Navy Officers involved in the so-called "public scoping" meeting conducted in December 2016 in Coupeville (other than the Commander of NAS Whidbey whom I believe is obligated to live on NAS Whidbey, but I was unable to verify that assumption), as well as the community representative from Virginia, was asked if they lived near OLFC or any OLF and the answer was emphatically "no" for each person. The Officer from Virginia indicated that she commutes 11/2 hours each way to work and back, to avoid FCLP's.

Then, why oh why does not the DEIS contain a discussion of efforts made to find alternative OLF sites, so that even NAS Whidbey might be relieved of any FCLP's? Thinking outside the proverbial box is an essential ingredient to satisfy the rigorous attempt by NEPA to keep in balance the relative tensions of the needs of the Navy and the rights of Americans not to be subjected to levels of noise that is bound to cause greater life-endangering health conditions and hearing losses, as well as untold, undiagnosed environmental concerns, including the poisoning of ground water drawn by civilians' water wells that already exceeds federal standard for more than one poison used by the Navy or its contractors at the OLFC.

Instead, as administered by the Navy, NEPA permits the Navy to select the data that is presented in a DEIS regarding its proposal (In this DEIS it is presenting 10 variations of its plan), permits the Navy to select the metric by which to flavor the data, analyze the data, present the data to the public. I note in particular that the DEIS is in a form containing an overwhelming amount of highly technical data, much of it being repetitive and encompassing 1500 or so pages, thereby making it unnecessarily difficult for the average person like me to comprehend and understand. For example, the DEIS refers back to numerous Tables, Figures and Charts and there are two volumes that comprise the DEIS and each volume contains 8 to 10 separate and lengthy subparts, as a Summary, Chapter, or Appendix, comprising about 1500 pages or so.

One hardcopy of the DEIS is made available in the Coupeville Library for the approximately 6,000 or so people who live in Coupeville or its Environs. The point is that the DEIS must be read in the online version, and reading or referring back to a particular Figure, Table or Chart, to understand the Navy's Narrative in the DEIS is time consuming, awkward, and nearly impossible, but maybe that also is a Navy strategy and tactic, in order to reduce meaningful analysis and public comment. Oak Harbor Library has two copies, which is understandable. Based on the public turnout for the scoping meetings, maybe Coupeville should have had more? It also is great that the following communities also received the same number as Coupeville: Lopez Island, San Juan Island, Orcas Island, Camano Island, Geumes Island, Port Townsend of Jefferson County, Jefferson County Library, Port Angeles, Sedro-Wooley, Sequim, Bellingham, Seattle, Mount Vernon, La Conner and Anacortes. I draw no conclusions from this information, as there is no need.

The DEIS also signifies Navy bias by the way it is written to suggest that none of the Navy's proposals would have a significant impact on the status quo, and to make a final decision regarding the 10 variations. There also is no independent analysis by any person or entity qualified to perform an independent analysis of the data or the pre-conclusions set forth in the Navy's DEIS. Please assume, just for a moment, that there are significant problems with the Navy's proposals, either in moral or equitable terms or that the DEIS contains seriously flawed information and the Navy relies on that information. Then consider the reality that the Navy, in administering the mandates of NEPA, imposes the monstrous burden upon the person who objects to the Navy's proposals, of proving, in a short period of time, that the proposal is immoral, inequitable, unconscionable, unlawful, fatally flawed, or whatever. That is a process that may subject civilians who live in Coupeville or its Environs close to OLFC to burdens and costs in violation of the Substantive rights of both Procedural and Substantive Due Process of Law guaranteed by the Fifth Amendment to the United States Constitution as well as the "Unlawful Takings" provision of the Fifth Amendment.

That NEPA process, as proposed in the DEIS to be administered by the Navy does not ensure either Procedural or Substantive Due Process as required by the Fifth Amendment to the United States Constitution to the civilians destined to be seriously impacted, culturally and economically, as well as collectively and individually. Further, it is highly likely that implementation of the Proposals would constitute "a "taking" of private and perhaps even public properties without just compensation, as required by the Fifth Amendment.

Some of the reasons why that is a near certainty, based on the so-called facts contained in the DEIS, are set forth in other of My Comments, attached.

If you would like to read another draft EIS, prepared pursuant to NEPA, that reflects a cooperative and flexible attitude on the part of the preparer, I invite you to take a look at Hawaii Volcanoes National Park's Mission Critical Administrative Aviation Plan and Environmental Assessment (plan/EA) for managing the use of administrative aviation over the park, released in February 2014. One of its statements is that it "provides a decision making framework for managing the Hawaii Volcanoes National Park" and even contains an upfront "Preferred Alternative."

SECTION 2.

DNL and ITS VALUE

It is often said and quoted that “noise is defined as unwanted sound. In other words, noise is sound that disturbs routine activities or quiet, and/or causes feelings of annoyance. Whether sound is interpreted as pleasant (e.g., music), or unpleasant (e.g., jackhammer) depends largely on the listener’s current activity, past experience, and attitude toward the source.”

“Sound is transmitted by alternating compression and decompression in air pressure. These relatively small changes in atmospheric pressure are called sound waves. The measurement and human perception of sound involves two physical characteristics—intensity and frequency. Intensity is a measure of the strength or magnitude of the sound vibrations, and is expressed in terms of the sound pressure level (SPL). The higher the SPL, the more intense is the perception of that sound. The other characteristic is sound frequency or “pitch”—the speed of vibration. Frequencies are expressed in terms of cycles per second or hertz (Hz). Low frequency sounds might be characterized as a rumble or roar, while high frequency sounds are typified by sirens or screeches. Noise analysis accounts for both of these characteristics in the units used to measure sound.”

“The human ear is sensitive to an extremely wide range of sound intensity, which covers a relative scale of 1 to 100,000,000. Representation of sound intensity using a linear index becomes difficult because of this wide range. As a result, the decibel—a logarithmic measure of the magnitude of sound—is typically used. Sound intensity is measured in terms of sound levels ranging from 0 dB, which is approximately the threshold of hearing, to 130 dB, which is the threshold of pain.

“Because of the logarithmic unit of measurement, decibels cannot be added or subtracted linearly . . . however, the following apply:

- If two sounds of the same level are added, the sound level increases by approximately 3 dB. For example: 60 dB + 60 dB = 63 dB.
- The sum of two sounds of a different level is only slightly higher than the louder level. For example: 60 dB + 70 dB = 70.4 dB.
- Sound from a “point source,” such as an aircraft, decreases approximately 6 dB for each doubling of distance.
- Although the human ear can detect a sound as faint as 1 dB, the typical person does not perceive changes of less than approximately 3 dB.”
- A 10 dB change in sound level is perceived by the average person as a doubling, or halving, of the sound’s loudness.”

“A-Weighted Decibel. Humans are most sensitive to frequencies near the normal range of speech communications. “A-weighting” reflects this sensitivity by emphasizing midrange frequencies and de-emphasizing high and low frequencies (see Exhibit F-3). Since the A-weighted decibel (dB) provides a better prediction of human reaction to environmental noise than the unweighted decibel, it is the metric most frequently used in noise compatibility planning.”

(https://www.faa.gov/airports/airport_development/omp/eis/feis/.../Appendix-F.pdf)

One of the features and factors for assessing and evaluating OLFC, in the context of a proposal that would increase the number of FCLP operations from 6,100 by up to 575 percent to 35,100 FCLP operations per year, is the use of “data” to quantify the noise levels that would result from the approval of one of the 10 proposals contained in the DEIS. The DEIS declares that “the DNL metric is the energy-averaged sound level measured over a 24-hour period, with

a 10dB nighttime adjustment.” (See Sec. 3.2.2.1, Volume 1, DEIS). While “noise”, such as Growler noise, can be and has been measured using sound measuring equipment, for the purposes of this DEIS or any other of several DEIS’s prepared and by the Navy for other proposals involving the Prowler and the Growler as well as other aircraft and the 2005 Air Installations Compatible Use Zones (AICUZ), no actual noise measurements have been collected, or at least not referenced in this DEIS. Instead, projections of Growler noise by computer software was used, first to project noise that is subsequently used to project and present “noise contours” for the geographical area subject of the DEIS. Thus, noise contours are included in the DEIS to indicate projected levels of noise within each contour of both Ault Field and OLF.

More specifically, the DEIS indicates that the “DNL contours are calculated based on modeled aircraft noise events using Noisemap [a software program used by Wyle Laboratories, the private business hired by the Navy to do the noise and contour modeling. Thus, it follows that the validity of the data upon which the choice of one of the 10 Alternative Proposals will be based, assuming that choice has not yet been made, is dependent upon the quality or of the data that was fed into the Noisemap computer program as well as the variable settings of that variable and flexible software. Neither the data nor the variables are disclosed in the DEIS or otherwise offered by the Navy for review or analysis.

The Navy, in the DEIS, goes on to say that the U.S. Department of Defense uses Noisemap as the accepted standard noise modeling program for assessing potential noise exposure from fixed-wing aircraft; and that Noisemap is routinely updated and validated through extensive study to provide the best possible noise modeling results for these applications. Again, it says nothing about the integrity of the data that is fed into Noisemap, nor about the variables within the software.

In my one-man attempt to read and digest the DEIS, I made a mental note to do some “digging” to see why there are so many apparent attempts made in the DEIS to say that Noisemap is the most reliable way to handle the data. My search found some holes, that may be significant. Lastly, no computer program in terms of sound exposure is anything but guesswork, some of which likely is educated or experienced but none of which involves real honest-to-goodness facts. As a “tool” it can be used to support a desired conclusion or it can be fully objective. If it is the latter, then there should be no biases.

A 3-page document I discovered online declares that it was written by Wyle Laboratory researchers and states as follows: “The following section was compiled by researchers at Wyle Laboratory” but curiously the document has no heading, Wyle Laboratory logo, or author-name attribution, and is not dated (which in and of itself is no different from numerous Navy website documents I have read in an endeavor to better understand “sound”. Especially in this new, unsettling era of “fake news” and “alternative facts”, I thought that should be noted. Further, the document doesn’t state the purpose of the article and draws no conclusions. However, I would characterize the purpose of the document as a “conscience” statement of a group of Wyle researchers, decrying the continued reliance by entities such as the Navy upon a 38-year old private study (by Schultz), in view of the fact that even the Author of that 38-year old study, Schultz, has updated and clarified the old study with a much newer study, as indicated below. I mention it, however, because in the DEIS, the lowest 24-hour average DNL-level used for drawing noise exposure contour lines in the DEIS is the range of 65 to less than 70dB DNL. In the DEIS, the sound/noise contours for the various Alternatives under consideration includes three ranges: 65 to less than 70 dB DNL, 70 to less than 75 dB DNL, and equal to or greater than 75 dB DNL.

I would also point out that there is an article, published in the Noise Control Engineering Journal (Jul-Aug 2005), which summarizes the 2005 positions of numerous Federal entities that recommend minimum day- night average sound levels of about 65 dB, as in the DEIS. He also

points out that the EPA is one of the agencies that recommend a DNL of 55 dB “as the level requisite to protect health and welfare with an adequate margin of safety”; the the National Research Council, Committee on Hearing, Bioacoustics, and Biomechanics has selected DNL as the preferred noise metric and with a level of 55 dB to represent the beginning of noise impact in residential areas; and basically the same result was reached and recommended by the Federal Energy Regulatory Commission, the World Bank, the American National Standards Institute (ANSI), and the International Organization for Economic Co-operation and Development, except that it would use a DNL limit of 50 dB in rural areas, like central Whidbey near the OLFC. The World Health Organization (WHO) recommends “a 16-hour daytime average sound level of not more than 55 dB and, approximately an 8-hour nighttime average sound level of not more than 45 dB to prevent “serious annoyance” in residential areas (but if you add a 10 dB penalty, as is customarily done for nighttime calculations that would increase the 45 to 55 dB, except the average limit would be for an 8-hour period of time.

The Navy follows the DoD example of using the 65 dB DNL, as first set by the Federal Interagency Committee on Noise (FICON). Paul Schomer, in his article, declares that “FICON generally understates the average percentage of a community that is highly annoyed. At a DNL of 65 dB, the average percentage of a community that is highly annoyed by aircraft noise is 28% . . . while the corresponding prediction by . . . FICON . . . is 12%.” The 65 DNL, preferred by the Navy, includes zero margin of safety for Civilians living near OLF, per the EPA. That is hardly comforting.

Back to the DEIS. In support of the decision to include only three DNL ranges, the DEIS states that “DoD recommends land use controls beginning at the 65 dB DNL level” and “research has indicated that about 87 percent of the population is not highly annoyed by outdoor sound levels below 65 dB DNL . . . [and that] “most people are exposed to sound levels of 50 to 55 or higher on a daily basis.” In other words, there is virtually no reason to include a lesser range because it would not apply to a significant percentage of the affected population. Then, the DEIS draws this conclusion “[t]herefore, the 65 dB DNL contour is used to help determine compatibility of military aircraft operations with land use, particularly for land use surrounding airfields, and in the lower threshold for this analysis.” That conclusion does not follow logically from the preceding quoted sentence to which it is intended to reference. The DEIS doesn’t mention the fact that the 38-year old Schultz study was **not** a consideration solely of aircraft noise. Indeed, it combined with aircraft noise, annoyance surveys involving road noise and railroad noise, both of which have been determined in numerous studies to be less objectionable than noise emanating from aircraft, especially military aircraft.

It would seem that the intransigence of the Navy, to move from outdated and invalidated studies, has something to do with other factors than community annoyance. Like forcing unconscionable levels upon Coupeville and its Environs even when there is no economic benefit and when that Navy action may well devastate Coupeville’s economy (See Sections 3 & 4, My Comments). I also point out that during the same time that commercial aircraft has become quieter, military aircraft has become faster and louder. Noise is a factor in the design of commercial aircraft. Noise isn’t a design element for military aircraft.

In any event, the continued use of a 65-70 DNL is a reality notwithstanding it’s scientific status as a too-high minimum standard, and notwithstanding that fully **28% of people will be “highly annoyed”** by noise from aircraft within the 65-70 dB DNL range, which is more than double the percentage referenced in the DEIS (100% less 87% not highly annoyed in a range below 65 dB DNL = 13% that are highly annoyed). The new studies also say that for **“an outdoor DNL of 55 dB, the percentage highly annoyed” is “12%” and that for a DNL for 60dB is 19 percent**, which is quite a bit higher, more than double the percentage of people said in the DEIS to be highly annoyed for the 65-70 dB DNL. Notwithstanding the DEIS use of 65-70 DNL as the threshold for “highly annoyed, this reference in the DEIS to the 55 dB DNL level seems that the DEIS maybe wants to use the higher level, but is worried about not using the lower 55

dB DNL level. There is no logical reason for the reference in the DEIS to the 55 dB DNL level in the context in which it appears. Further, the DEIS makes no mention of how any of the DNL levels relate to actual decibel levels, or how DNL's are calculated.

I point out that the contour lines for a 55 dB DNL (which was sufficiently important for the Navy to attempt to discredit or disregard its use) as quoted and indicated above, would show significant impact for OLFC under Proposal 1A, 2A, or 3A,. It would show that imposing 80% of all FCLP operations upon the neighborhoods surrounding OLFC as per Alternative 1, Scenario A, would place the entire city limits of the Town of Coupeville, as well as the area known as Juan de Fuca, which is on the West shoreline of Penn Cove (the business district of Coupeville is on the East side of Penn Cove) in all likelihood, within the 55 dB DNL range, as well as additional properties south of Runway 32. In contrast, the contour lines drawn for 60 dB DNL under the No Action proposal would continue to exclude some of the population of the Town of Coupeville (see, for example, the dotted dark blue contour lines in Figure4-2.5).

A comparison of the contour lines drawn for Ault Field and OLFC is another example of how the DEIS is biased in favor of supporting a decision to impose a far greater noise burden upon the OLFC vicinity, regardless of which of the four Alternatives is selected (i.e., the so-called "No Action Proposal", which literally is an Alternative for the reason that 6,100 FCLP operations at OLFC has never been approved under the requirements of NEPA, or Alternative 1, 2, or 3). Notice that the contours drawn for Ault Field have "lobes" that extend out for about 10 miles, which gives the Ault Field contours a "star" kind of look. No similar lobes were drawn on the contours for OLFC. The DEIS data suggests that the lobes for Ault Field are drawn because of the departure flights and arrival flights at Ault Field for Growlers that fly to and from OLFC, and thus also are reflected in Table 4.2-1, which contains "Estimate of Acreage and Population within the DNL Contour Ranges" for Ault Field and OLFC." To the extent the "lobes" are drawn over land near Ault Field, the acreage and population affected under the lobes at Ault Field are increased to that extent. You might say that those flights should count and be reflected in the Ault Field contours. While I don't disagree, there is no logical reason the same lobes would not apply in the contours drawn for OLFC, if the proper data had been fed into the NOISEMAP program. Consider this: For every FCLP-related flight arriving at Ault Field (and is reflected in the contours), where that flight exited a "closed loop" FCLP session and departed OLFC, but is not counted or reflected in the contours for OLFC even though it is an actual flight and is in addition to the closed loops entailed in a FCLP. Similarly, flights that depart Ault Field (and that are counted and reflected in Ault Field contours, acreage, population and other operations flights, per Table 3.1-3 and Table 4.2-1) and that arrive at OLFC are not counted, even though they are actually noisier than FCLP loops because arrivals generally are flown at a considerably higher velocity than flights in FCLP closed-loop patterns and are well under 500 feet. Footnote 3 to Table 3.1-3 in the DEIS, reads as follows: The term "Other Operations includes Touch and Goes, Depart and Re-enter, Ground Controlled Approaches, and Carrier Controlled Approaches" at Ault Field, but not at OLFC. Ault Field is credited with 53,100 Other Operations flight per year and OLFC is credited with ZERO Other Operations flights involving Growlers. The number per year would be the number of Sessions flown on a Flying Day multiplied by the number of Growlers in each Session. If the data was intended to be slanted to make the facts seem different from what they really are, the DEIS reflects more than one way to accomplish that. This makes the DEIS, in my opinion, a disingenuous Navy document.

The presence of lobes for Ault Filed but not OLFC increases the number of acres to which the sound contours apply. In the case of Ault Field, the lobes are over both land and water. I wouldn't be surprised if you told me that water is included as acreage. But that would be ridiculous as a basis of concluding that the contours affect more acreage around Ault Field than OLFC. However, apparently it is a big deal to at least one former Navy Commander. Former [REDACTED] in a Declaration filed in the United States District Court for the Western [REDACTED] ton in an action against the Navy, regarding the use of OLFC, declared that "[t]he population surrounding Ault Field is greater than that surrounding OLF

Coupeville, which means noise impacts from aircraft operations at Ault Field impact a greater number of people than at Coupeville.” My reading of that quotation is that former [REDACTED] believes it would be more just to saddle Coupeville than Oak Harbor with m [REDACTED] burden because there are more people in Oak Harbor compared to Coupeville. He doesn't mention categories of people, for example military or civilian, employees at NAS Whidbey, military personnel stationed at NAS Whidbey, time of the day, or any other pertinent fact to give clarity if not credence. He also does not mention comparative economic differences between the two communities, the fact that one is virtually totally dependent upon NAS Whidbey for jobs, school money and housing rentals while the other has virtually nothing to do with NAS Whidbey other than getting the noise from FCLP's. He doesn't mention the fact that Coupeville is substantially reliant upon Tourism to bolster its economy and its unique nature as the second oldest town in Washington or that tourists will flee is more noise is dumped involuntarily upon Coupeville.

There's more. The DEIS contains estimates of the “Estimated Aircraft DNL at POI for the Average Year No Action Alternative” (Table 5-5). I searched in the DEIS for similar estimates for each of the other Alternatives and Scenarios (9 in total) and found none. I can't explain. Those estimates might be revealing as to whether increasing the FCLP's at OLFC by as many as 575 Percent of 6,100 would move the DNL year-long average, or expose the average used simply as a way to dilute beyond belief the actual noise impact, in that context. In any event, the highest POI on the list for any location listed is a POI near Ault Field, namely Sullivan Road, which shows a quite high DNL of 90. It is difficult to comprehend, in a more familiar decibel context, just what a 90 dB DNL means. Nothing in the DEIS makes that easy. It is as though the Navy prefers to obfuscate the real effect of a 90 dB DNL. In contrast, the highest DNL for any POI location for OLFC is Admirals Drive, an area with scores of houses in the neighborhood, with a DNL of 79.

We all know that Admirals Drive (the actual terminology used is “Admirals Drive and Byrd Drive”, which is an intersection in the community of Admiral Cove, a community of about 400 homes) is a virtual small city by itself. We also know that Admirals Drive is located just South of Runway 32 and is subjected to very high levels of sound measured in decibels. The DEIS says that the highest level, expressed in decibels is 118 decibels, SEL (sound exposure level), which you can find an explanation for online, quicker than in the DEIS. For Sullivan Road the SEL is 121 dB SEL. What do we know about Sullivan Road? It is adjacent to Runway 25 and close to the intersection between Runway 25 and Runway 07 and is very close to the northerly geographical boundary of NAS Whidbey. Comparing its overall impact on people living below the POI location, one Internet site says there are **three** people who live on Sullivan Road who are registered to vote (so there may be a couple more unregistered people?). In The DEIS, Sullivan Road is the closest POI to any runway at Ault Field or at OLFC. There is no POI at OLFC that is as close to either Runway 14 or 32. But there is a road, similar in geography to Sullivan Road, namely Keystone Hill Road, which is just to the west of the OLFC westerly boundary (and it only has maybe a dozen houses, too).

It is also an interesting fact that the average DNL for the 5 POIs near Ault Field is 68.2 and the average for the four at OLF is 63.5. I know that DNL numbers don't lend themselves to averaging in pure mathematical terms because the measurement of a decibel is not linear. Sound loudness doubles every 3 dB, so it would be essential to compare apples to apples instead of to prunes. In comparing Ault Field's 60 dB DNL contour line with that of the 60 dB DNL for OLFC, it would seem to me that the comparison would be totally, absolutely flawed unless careful consideration is given to the comparative locations of the POI's in geographical terms. Otherwise, what would prevent someone from looking at contours and saying “fix them to show that the contours are wider and have more adverse impact at Ault Field.”

It is no big deal for a computer software program to have settings that would equalize the POI's in numerous ways. But what we know is that the POI's between Ault Field and OLFC yield

differing results from which people like former ██████████ drew conclusions. I'm not saying the figures are disingenuous, but I'm not ██████████, either. But I will say that given the superficial narrative of former ██████████ made when he was the Commander of NAS Whidbey, is at best ██████████ my opinion that the DEIS is not a document in which I have much confidence.

Another aspect of my suspicions about the validity of the contour lines drawn for purposes of the DEIS results from a visual analysis of the POI's. For example, It is difficult to understand how the DNL for Skyline, a residential neighborhood POI on Fidalgo Island near the northwest corner of Fidalgo Island and situated several miles from Ault Field and approximately 20 miles from OLFC has a higher DNL, 56 dB, for the No Action Alternative than the Cox Road and Island Ridge Way POI near OLFC, where the computer-prescribed DNL is said to be 51. There are no FCLP flight tracks close to that the Skyline POI, although the Figure 3.1-3, that shows arrival and departure flight tracks for NAS Whidbey, shows departure flight tracks near Skyline. But even if the DNL for the Skyline POI entered into the DNL calculation, but similar flight tracks over the OLFC POI's are not data included in calculating DNL for the OLFC POI's, which I believe to be true, then that would be further evidence that the DEIS is a biased document with a hidden agenda and is a disservice to the Community of Coupeville and its Environs.

It is further evidence that the impact of all of the proposals and scenarios are biased in favor of imposing the biggest noise burden possible upon Coupeville and its Environs and making it seem that the burden is slight and of "No Significant Impact." In that regard, I wish to point out the, in Section 3.2.4.1 of the DEIS, the narrative states, after describing why the "lobes" for Ault Field contours extend 6 to 10 miles from the four Ault Field runway endpoint, this about OLFC: **"The DNL contours at OLF Coupeville are generally driven by the FCLPs conducted at" OLFC** [Emphasis added].

For all of OLFC, there are no arrival or departure flight tracks shown on any figure provided in the DEIS, although as discussed above, there are both arrival and departure flights that make a heckuva lot of noise because of low altitude and higher velocity, as compared with FCLP closed loop flights, during the arrival at OLFC and during the departure from OLFC and often that noise level lingers and lingers. It isn't silent. Moreover, at Cox Road, there would be noise from FCLP operations when Growlers are using Runway 14 and execute a left turn after the "Go" portion of the FCLP. The narrative for the discussion about DNL Noise Contours also contains a footnote 6, which reads "These DNL Noise contours were modeled specifically for this analysis to determine the change in the noise environment related to the Proposed Action; therefore, they differ from the official noise contours currently on record, discussed in Section 3.5.1.2, Regional Land Use and Land Use Controls)." Shouldn't they be modeled both ways, for comparative reasons?

Again, to me, the DNL's attributed to the POI's for Ault Field and for OLFC suffer in terms of credibility.

Another unexplainable aspect of the POI's is that there are 5 selected for Ault Field and 4 for OLFC. Of those selected for OLFC, 3 of the 4 are outside of the Runway 32 that has been used in the past for 70% of the FCLP's. at OLFC Someone chose 3 of 4 in the area that gets 30% of the FCLP's? That is a significant reason for why the relative average for OLFC is 4.7 dB DNL lower than for Ault Field. Considering that the intensity of sound levels double for every 3 decibels, 4.7 dB DNL is significant.

My suspicion is that there are many additional "issues" associated with the data resulting from NOISEMAP and the computer. It is highly likely that I am not smart enough nor do I have sufficient time or energy to discover all of them. Someone, with authority needs to step up and tell the Navy that enough is enough. I wish I had that authority.

Another aspect of the Science of using DNL's in the context of military aircraft is that the primary force in combatting aircraft noise has been the FAA. The FAA has been very effective in effecting substantial reductions in commercial airport noise at the same time military aircraft noise has been increasing. As discussed elsewhere in My Comments, the noisiest commercial aircraft, over time, has been replaced. Military aircraft noise has never been more intense. Indeed, the EA-18G is at the top of the Noisiest Military Aircraft, along with the F-18E/F, which is the airframe used in building EA-18G Growlers. My point here, merely is to point out that the FAA metrics and noise discussions are no longer directly translatable to understanding the dimensions of noise from military aircraft. I located a map from the Massachusetts Institute of Technology (MIT) website that suffices to compare the noise contours for two commercial airports North Chambers Field and Norfolk International Airport, with two Navy "airports" (NAS Oceana and NALF Fentress.) The contours for the commercial airports shown in DNL are absolutely dwarfed by the contours for the two Navy facilities. As you consider the use of contours in the context of OLFC, the effect of the noise cannot be understood in the context of any vision of noise regarding your experience with commercial airport. One context is Goliath, the other little David. One is a Giant Giant, the other not so much See Map, attached to this Section). The actual reality of the burden imposed upon Civilians living below FCLP's at OLFC is tantamount to living with noise terror.

Lastly, I would like to take a look at the concept of calculating DNL for the purpose of drawing attention to the many variables that go or should go into that calculation. Some general principles are these, derived from Quiet Skies NorCal 2016, from their website:

- In a normal environment, a 3 dB change is the general threshold of detectability.
- An increase of 3dB is a doubling of the sound energy.
- An increase of 6 dB is an increase in sound energy by a factor of 4.
- An increase of 10 dB is an increase in sound energy by a factor of 10

In a typical case of comparing two or more DNL's or calculating even a single DNL, there are several variables in that calculation, for an EA-18G, and include:

- The noisiness of the Growler at a certain distance, such as the distance of a POI from a Runway, measured in decibels.
- A penalty if the Growler is using thrust or engaged in a powered landing, to contrast a Growler flying with less throttle, usually up to 10 dB, but individual parameters for the EA-18G might be precisely revealing in that regard.
- Altitude is a factor when comparing 2 Growlers. An Growler at 250 feet will be perceptibly louder than one at 1,000 feet, for example.
- Horizontal distance from the flight track.
- Sound duration in time in seconds or minutes.
- SEL, measured in decibels, which is the single event noise metric, and typically is higher than the peak loudness.

Any of those elements, if changed, will affect DNL calculations. My only point here is to acknowledge the complexity of calculating DNLs. Reliance on DNLs requires a bit of faith or confidence and if there are any errors, they should be on the side of too much clarity, when soliciting public comments from the public. Especially if a DEIS proposes 10 proposals for consideration and public comment.

Compared to actual noise measurements, DNL likely is not as valid in the context of drawing contour lines for evaluating noise associated with any particular proposal or alternative. Noise contours drawn utilizing actual measurement of noise might well differ significantly with those included in or inferred from data in the DEIS.

In terms of measuring community annoyance, it likely would have predictability value in projecting community annoyance, especially the “highly annoyed.” In part, that is because there are a lot of studies regarding annoyance and the experience of having used DNL enhances public predictability. Most of the surveys, however, involve commercial aircraft, not military aircraft. Moreover, FCLP’s involving thousands of similar closed loop flights on a “racetrack” resembling flight pattern are a far different series of events than comparing an arrival or departure flight. They are the absolute worst flights and represent a serious danger to the health of Civilians living below FCLP operations. Further, commercial aircraft over the last 50 years have been designed to be and are much quieter, while military aircraft have never been noisier, louder or more intrusive.

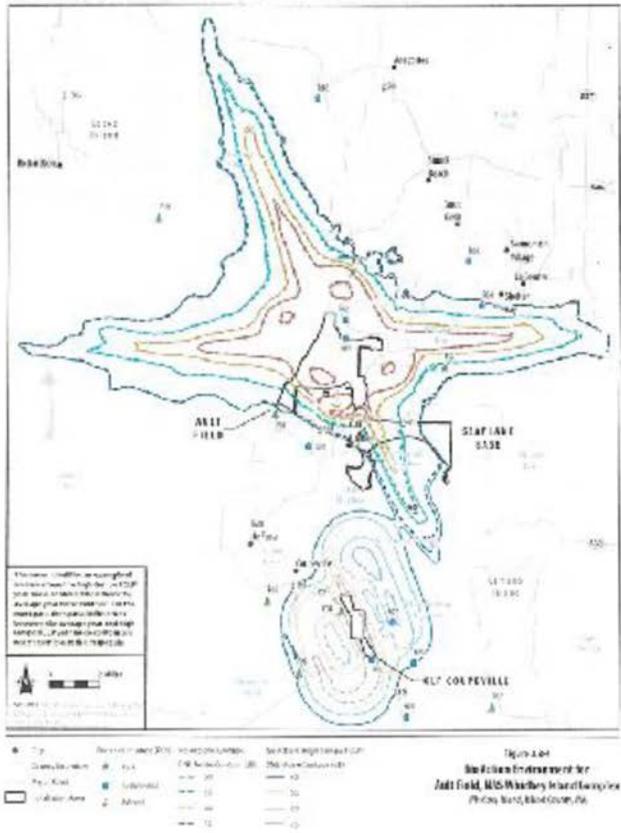
In the context of Coupeville and its environs, there are some real dangers in understating annoyance factors. That is because of the importance of a continuing stream of Tourists to the Coupeville economy, which economy has little reliance upon NAS Whidbey or the Navy. In view of the many instances in which studies have validated the use of 50 or 55 dB DNL thresholds to measure community annoyance, and because the Schultz study of 1978 has been updated and modified by Shultz himself, and because almost all federal agencies already have shifted to the 55 dB DNL threshold to predict community annoyance, it makes no sense and defies reality to continue to represent that the Schultz is the basis for adhering to the 65 dB DNL threshold for predicting the “highly annoyed.” As applied to Tourists, whose choices to come to Coupeville feed the Coupeville economy, it also seems unreasonable to conclude anything other than that Tourists who come to Coupeville and its environs to enjoy a day, weekend, or week or a month away from their busy lives elsewhere likely will be more noise-sensitive than any other group. Otherwise, you are on the side of risking serious or catastrophic financial crisis in that community which has virtually no interrelationship with NAS Whidbey or the Navy. The Navy’s continuing use of the OLFC for faster, louder aircraft already has soured Navy pilots and crews from living in or around Coupeville. Will the Navy now gladly participate in the souring or collapse of Coupeville’s economy?

It may well be the case, here and now, that an Alternative OLF location is the only responsible solution that can give serious consideration to the law, that is NEPA, and to the overwhelming opposition in Coupeville and its Environs to any of the nine Proposals embodied in Alternatives 1, 2, or 3.





Figure 3.2-4 No Action Environment for Asit Field, NAS Whidbey Island Complex



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Figure 3.2.5 No Action Environment for OLF Coupeville, NAS Whidbey Island Complex

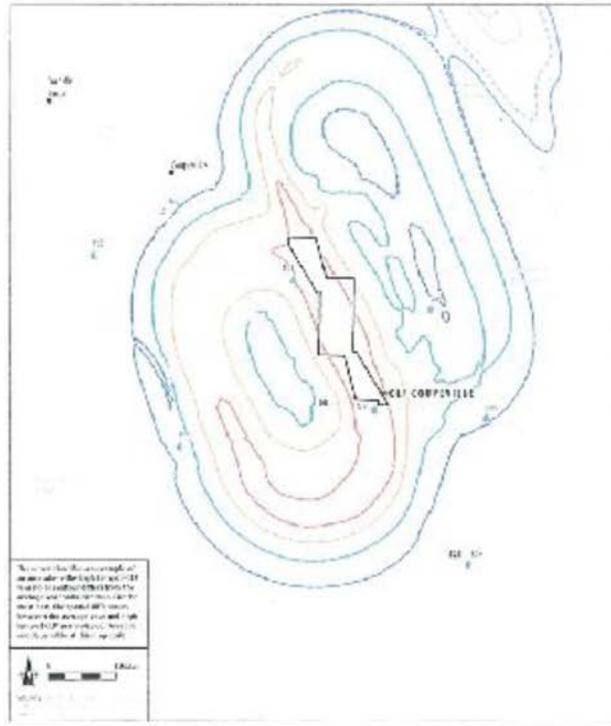
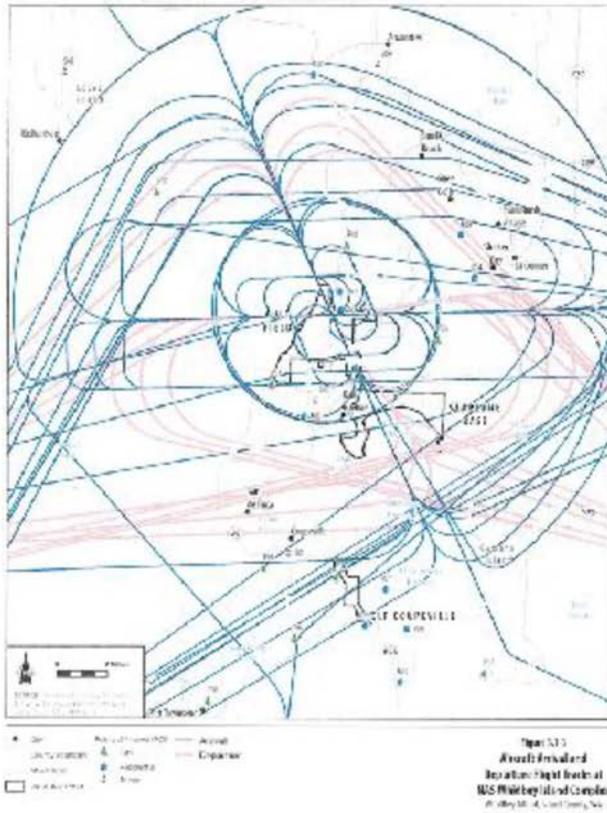


Figure 3.2.5
No Action Environment for
OLF Coupeville, NAS Whidbey Island Complex
November 2016

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Figure 3.1-3 Aircraft Arrival and Departure Flight Tracks at NAS Whidbey Island Complex



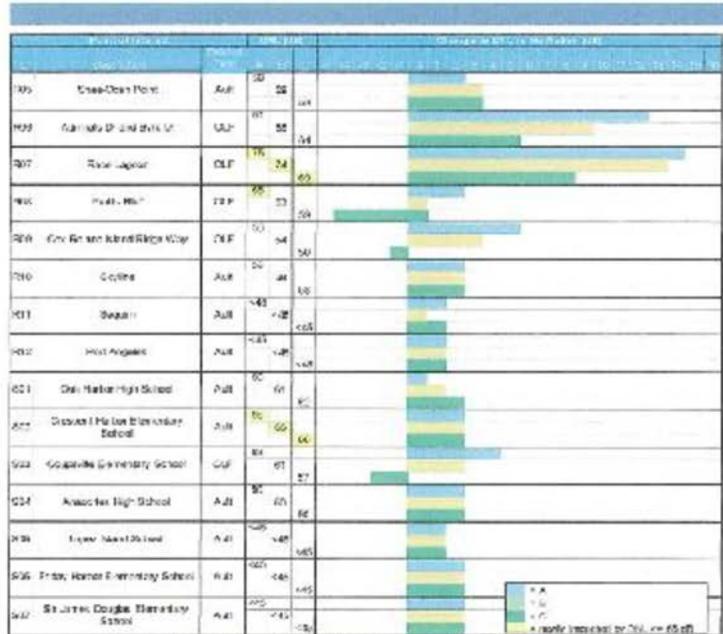


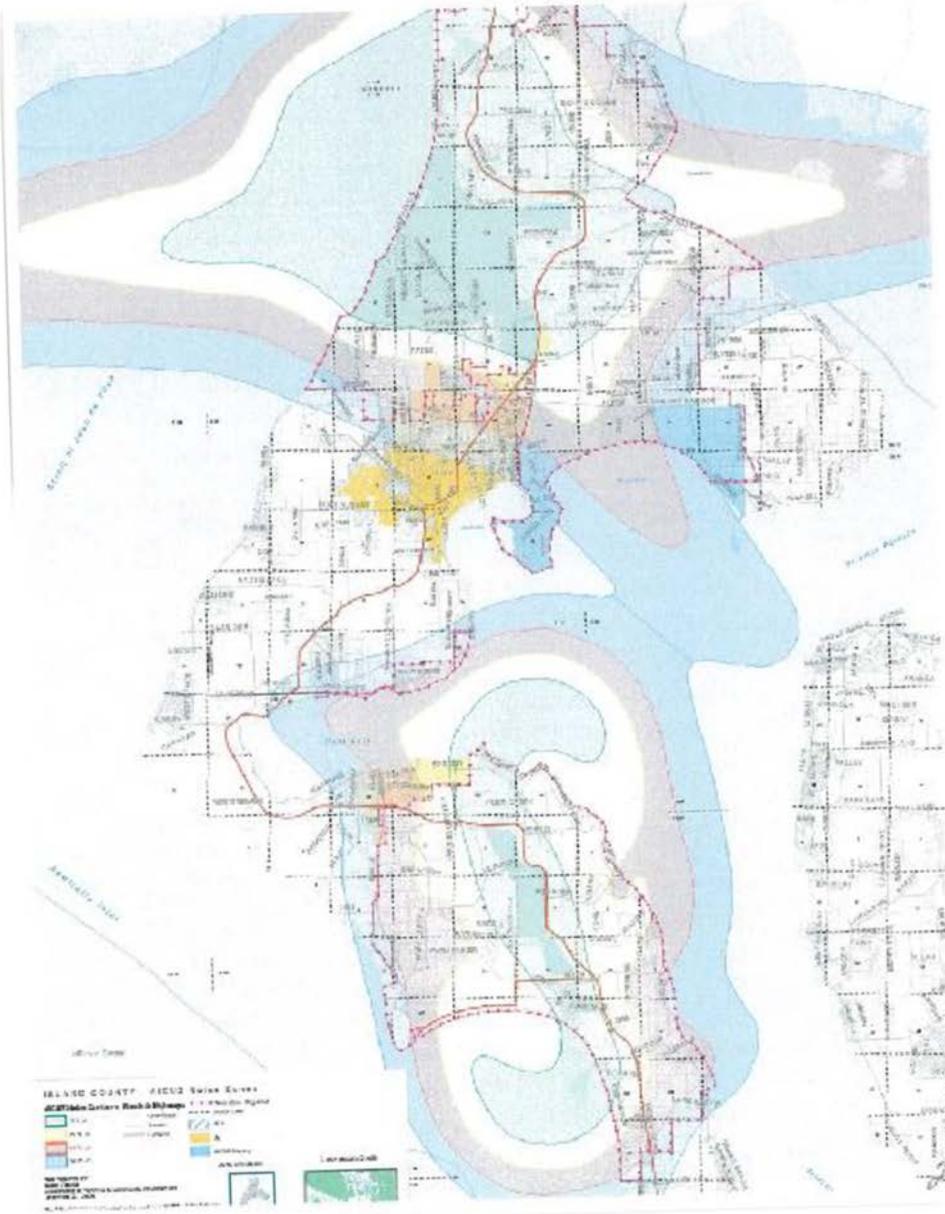
Figure 6-8. Estimated Aircraft DNL at POI for the Average Year Alternative 1 (continued)

Under the High Tempo Year Alternatives 1A/B/C (Appendix G), 8-10 POI would experience DNL greater than or equal to 65 dB and 5-4 residential POI would experience DNL greater than or equal to 75 dB. Two of the latter category would be near Air Field (R01 and R02) and two would be near the OLP (R05 and R07). One of the 7 schools, POI R02, would experience DNL of at least 65 dB, i.e., 66 dB for Alternatives 1A, 1B, and 1C.

Under the High Tempo Year Alternatives 1A/B/C, increase in DNL would be greatest for 1A and smallest for 1C. Increases in DNL would range from 1 to 18 dB, relative to the High Tempo No Action Alternative. POI R07 and R05 would experience increases in DNL of up to 15 and 12 dB, respectively. POI R07 would be newly impacted for Alternatives 1A, 1B, and 1C with DNL of 70-76 dB. POI R06 and R08 would also be newly impacted, but only for Alternative 1A, with DNLs of 65 dB.

6.4.2 Potential Hearing Loss

Tables 6-8a through 6-8c show estimates of the population within 1-dB bands of Leq and their associated NIFLS for the Average Year Alternatives 1. The Average and 10th Percentile NIFLS categories, up to 163 and 1,594 people would have the potential for NIFLS greater than or equal to 5 dB, respectively. Up to 76% of the Average NIFLS population would be associated with the OLP, and 46% of the 10th Percentile NIFLS population would be associated with the OLP, both for Alternative 1A.





SECTION 3.

COUPEVILLE & ENVIRONS: A QUALITY OF LIFE AT RISK OF DEVASTATION BY THE UNITED STATES NAVY?

The purpose of this Section is twofold: First, to acknowledge that the Town of Coupeville and its Environs, the vicinity surrounding OLFC, is idyllic and unique and vastly different from Oak Harbor. It is not my contention that it is better or worse than Oak Harbor, but that it is different. Coupeville's economy is built upon a structure or basis totally different from the economy of Oak Harbor. Coupeville's economy is not dependent upon jobs or employment at NAS Whidbey, in clear contrast to Oak Harbor. However, it is my contention that Navy action, proposed in the DEIS, likely would devastate the level of Tourism that is essential to the economic health of Coupeville, and that any of the nine Proposals set forth in either of Scenarios A, B, or C of any of Alternatives 1, 2, or 3 the DEIS, would have a Very Significant Impact on Coupeville and its Environs.

Second, a further purpose in this Section of My Comments is to observe the differences that have prevailed since the 1950's and that combine to make Coupeville a uniquely special place with characteristics that must be protected and cherished, not devastated or destroyed by Navy intransigence with finding a permanent solution to the conflict with OLFC (See Section 6. Alternatives to OLFC. Lastly, this Comment will observe the differences that have prevailed and existed in Coupeville since the 1850's, and should be permitted to continue to exist and not be devastated or destroyed.

In showing that Coupeville has been around a long, long time, it is often said, accurately that Coupeville is the second oldest city in Washington. The following is an excerpt from an article entitled "Front Street, Coupeville, Washington (www.chwahistoric.coupeville.com) that reads in part as follows:

"In 1848 Whidbey Island's first white settler, Thomas Glasgow, filed a land claim on what is now Ebey's Prairie. . . . Following the Point Elliott Treaty in 1855, many of the Lower Skagit people were placed on the Tulalip reservation. A few continued to live in Coupeville."

"The same Whidbey Island locations that appealed to the Skagits [tribes] also appealed to early white sea captains and farmers who explored and settled central Whidbey Island in the early 1850s. Ebey's Landing, on the Strait of Juan de Fuca, was an easy place to reach by water and the nearby prairie and protected harbor of Penn Cove made excellent sites for establishing homes and farms."

"On September 27, 1850, Congress passed the Oregon Donation Land Claim Act, granting free land (320 acres to single men and 640 acres to married couples) to anyone who had settled on the land before December 1 of that year. Colonel Isaac Neff Ebey (1818-1857) was the first man in Central Whidbey Island to file a claim (640 acres) on October 15, 1850. During the years of the Donation Land Claim Act, updated in 1853 and again in 1854, 29 settlers registered claims on the Prairie and Penn Cove."

"A small settlement called Coveland formed at the head of Penn's Cove and served as the first Island County seat (1853-1881). Captain Benjamin Barstow (d. 1854) opened the first trading post at this location in 1853. A group of land developers platted Coveland in 1888 and changed the name to San de Fuca, chosen because of its proximity to the Straits of Juan de Fuca. From 1881 to the present time, Coupeville has been the Island County seat" [Emphasis added].

Thus, History shows that Coupeville was established as a result of the migration of settlers to the area of Central Whidbey Island, among other places, as a direct result of the 1850 federal Oregon Donation Land Claim Act. While many the characteristics that once defined many of those other places created pursuant to that federal program to encourage migration, and that were cherished by residents of those other areas, even including Oak Harbor, have changed over time, but that is not the case with Coupeville. In terms of its ambiance, its citizenry, its business establishments, indeed its Comprehensive Plan, Coupeville cherishes its past and believes that its past is its present and its future, in terms of its economy. Coupeville seeks visitors and tourists on a year-round basis. Perhaps its Chamber of Commerce could tell you, if you ask, what is the rate of Tourists who arrive in Coupeville as return-Tourists. My guess is that rate might surprise the Navy. My point simply is to say that Tourism and the ambiance of Coupeville, along with its preference for locally-owned and operated tourist-service businesses like B&B's, restaurants, retail shops, souvenir shops, art galleries and artists, combine to make Coupeville, in today's world and even on Whidbey Island, truly special and unique to thousands of people who visit as tourists or who choose the lifestyle that comes with living and working there. I believe the economic vitality of Coupeville cannot and will not be sustained if Growler noise prevails and is increased, as proposed in the DEIS, and that would be a large step backward, not forward, and ensnaring Coupeville is the vice of noise with virtually no consideration given in the DEIS to the requirements mandated by NEPA for the preservation of cultures and lifestyles fostered by communities like Coupeville.

Nearly 90 years after Coupeville was established, and 61 years after Coupeville became the County Seat of Island County, NAS Whidbey was commissioned on September 21, 1942, near Oak Harbor. Not Coupeville.

It is useful, for these purposes, to gain a solidly-based understanding of Coupeville and its Environs. In that regard, a feature article was published on page M4 of the Sunday, November 4, 2007, Sacramento Bee, entitled "It just doesn't get much more pleasant than in Coupeville." I have used a 9-year old article to reflect that the views of Coupeville in yesteryears exist today. The article is an attempt by the author to provide the reader with a taste or described feeling for what it is about Coupeville that is unique and desirable, both as a place to live but also as a place to visit for a day, a week, a month, or whatever. I think the author succeeded and I have quoted some of that flavor and feeling:

"Coupeville, Wash. — "So here's what I've decided about this central Whidbey Island town and the forests, beaches and prairies that New England sea captain Thomas Coupe described to his wife as an 1850s "Garden of Eden.""

"Located mid-island between Langley and Oak Harbor, Coupeville still feels more like the pioneer town it was in the 19th century when Coupe laid claim to land on the shores of Penn Cove and turned Coupeville into a major Northwest port for the farming and maritime trades."

Quoting the owner of Elkhorn Antiques and a Coupeville resident for 35 years, the article says ""It's the last place on the island that moves at a slow pace." So get an early start"

"If you're coming from Seattle, figure on about two hours of driving and ferry-riding between you and the smell of salt air:"

"8:30 a.m.: Take the Clinton-Mukilteo Washington State Ferry for a 20-minute crossing across Possession Sound to Whidbey Island."

"Follow the . . . highway toward Coupeville (28) miles past the roadside stands selling fresh dahlias and basil. Notice how the forests give way to open land. These are the Whidbey Island prairies, large and fertile farm areas formed on the sites of ancient lakebeds."

"Chances are it will be dry in Coupeville even if it's raining the Seattle or Langley. Whidbey Island is about 50 miles long. The northern half lies within the Olympic rain shadow, and rain averages just 18 inches annually compared with 30 inches in the southern half."

"9:30 a.m.: Breakfast at the Coupeville Coffeehouse in the yellow building with the red trim at 12 N.W. Front St., overlooking Penn Cove harbor. . . ."

"A wild blue heron nicknamed Henry makes an appearance most mornings and afternoons on a sandbar near the red warehouse at the end of the wharf. Find a seat on the deck or inside . . . under a sign that says "Loitering is Encouraged.""

"10:30 a.m.: Walk the waterfront. Coupeville is part of a 25-square-mile area called Ebey's Landing National Historical Reserve, a 17,400-acre national park area that includes federal land, two state parks, private farmland, and a collection of historical buildings and Victorian-style homes in and around the old waterfront."

"Stop by the Island County Historical Museum . . . for a brochure for a self-guided walk around town and a 43 ½-mile driving and bicycling tour of the reserve."

"Start at the Coupeville Wharf and Warehouse at the foot of Northwest Alexander. Steam-boat service connected Coupeville with Seattle and Everett until a bridge built in 1937 at Deception Pass linked the north end of Whidbey to Fidalgo Island and Anacortes."

On display are the preserved bones of Rosie, a 33-foot gray whale that washed ashore in 1998."

"The walking tour includes 64 landmarks . . . so pick and choose and leave time to browse. . . ."

"Noon.: Tea time. The houses of former sea captains and merchants are scattered throughout the town. Anna's Tea Room, 606 Main St., feels more like an eccentric East Coast auntie than a sophisticated English tearoom and that fits Coupeville's small-town image just fine."

"Order a pot (\$3 for a small, \$5 for a large) and pick your own cup and saucer from a cabinet filled with a collection of mis-matched china. Settle into the sofa by the window or a corner table and plan your afternoon over lunch or warm scones. . . ."

"1 p.m.: Explore the Reserve. Named for Isaac Neff Ebey, one of the island's early permanent settlers, Ebey's Landing National Historic Reserve . . . includes eight miles of beach with a bluff trail looking out over the Strait of Juan de Fuca; paths through the prairies; a historic lighthouse at Fort Casey, a former military base, now a state park; forest land and lots of places for bird-watching and observing wildlife."

"Start at the beach. . . . There's a choice of two hikes: a 3 ½-mile loop trail along a bluff that skirts the strait. The other is a shorter walk inland through the prairie to a pioneer graveyard called the Sunnyside Cemetery."

"Kids will enjoy a visit to the Admiralty Head Lighthouse at nearby Fort Casey. Built with walls 18 inches thick to withstand earthquakes, it's open to the public for free. . . ."

"3 p.m.: . . . Lavender Wind Farm three miles from the Coupeville Waterfront. Names for the winds that blow off the strait in winter, the farm includes 2 ½ acres of organically grown lavender." Come pick your own, buy a plant, or walk the outdoor labyrinth. . . . Bunches of dried lavender hang from the ceiling of a small shop stocked with vanilla-lavender ice cream bars, jellies, teas, pillows and sachets."

"5 p.m.: Sample the seafood. Connoisseurs consider Penn Cove mussels to be some of the world's finest. In Coupeville, they're farm-raised by Penn Cove Shellfish LLC. All the restaurants serve them, along with local crab, oysters, and clams. . . ."

"If you're over 21 and up for some fun, try Toby's Tavern, 8 N.W. Front, a local hangout in an 1890's former beer parlor. . . ."

A statement I noticed in tourismmatters.com, regarding Whidbey and Camano Islands' Tourism, is that "Tourism is a major industry for Whidbey and Camano Islands, supporting approximately 1,600 existing companies and stimulating new business development and investment through

direct trip expenditures and real estate sales; and furthering opportunities to enjoy “peaceful landscapes and opportunities for biking, hiking, kayaking, sailing, or just breathing in the fresh sea air and relaxing in locally owned and operated restaurants and Inns are some of the enjoyable things about the Islands.

Similarly, a wide variety of interests, said to be met in exploring the Island County Historical Society Museum, Admiralty Lighthouse, Meerkerk Gardens, antique shops, art galleries, heritage farms working studios, farmers markets, wineries, and the Coupeville Arts Center with year-round fine art classes, are but a few of the choices. The Town of Coupeville Comprehensive Plan, adopted in 1994 and revised numerous times through 2003, touts the things that foster the Coupevillian lifestyle. It also indicates an intention to guide the future growth, character and development of Coupeville for the next ten to twenty years. The plan declares numerous goals, including “to promote a development pattern that recognizes and enhances its historic small-town character; to provide a self-balanced mix of land uses, including recreational and cultural opportunities, to preserve the town’s rural and agricultural heritage. There is no mention in Coupeville’s Comprehensive plan regarding OLFC and FCLP operations, or the Navy. I’m quite certain that is not intended as an insult to the Navy, but rather is support for the notion that Coupeville values its small town nature, quaint size and architecture, and slow pace of life. I once asked a City Councilman why Coupeville had a city wide speed limit of 25 mph on every street and road in Coupeville, but Highway 20, which is controlled by the State of Washington. He told me that he would change Highway 20’s speed limit within the Coupeville City Limits, to 25 mph, if only he had the authority (I was against the city-wide speed limit. Still am. But I understand and accept it). I mentioned the absence of chain restaurants to my real estate agent (married to the City Councilman referenced above) who hails from one of the pioneer families that settled Ebey’s Landing, when I was negotiating the purchase of the lot upon which my home now sits, and she boldly told me that if I wanted to eat grease I should go to Oak Harbor. I think that was an insult intended only for me. Coupeville, simply stated, is far different from Oak Harbor, much less the Navy. In the intervening years since then, I have learned that Coupeville is a special place if you accept the things for which it stands. And many Tourists, visitors, and Coupeville residents are living proof.

In an issue of the USA Today newspaper, an article written about Coupeville by Nicole Crawford, and noticed by me at www.usatoday.com, states that Coupeville, the second oldest town in Washington, still provides a taste of waterfront farm life. In regard to “Outdoor Ventures” she writes that Colonel Isaac Neff Ebey was one of Whidbey Island’s first settlers, and the scenic Ebey’s Landing is named after him. She describes the Coastal bluffs of Ebey’s Landing as towering as high as 270 feet, making them the tallest bluffs in the State of Washington. For a moderately easy hike she advises starting at the Prairie Overlook and continuing for half a mile to the visitor’s center, which is located in a 1850s homestead. Finally, she says, if you are up for a challenge, to continue on the trail and climb the bluffs to gain access to views of the Olympic Mountains, Vancouver Island, Strait of Juan de Fuca and San Juan Islands.”

I have done all of that many dozens of times over the years. It is a 2 to 2 ½ hour easy hike that exposes the hiker (including out-of-town friends), in a compact but comprehensive way to the wonders of the area that is and surrounds Coupeville. It is a place where visitors can come, visit, and escape the noise and business of their everyday lives, elsewhere, and capture the feeling of living in harmony with nature and the environment, appreciating both the wondrous visuals of mountains, boats, eagles. . .

These aspects of life on Whidbey and around Coupeville in particular bespeak a long-standing culture and way of life far different from city life, military life, or even life in Oak Harbor. Twice in

the 14 years I have resided full-time on Whidbey Island, the City of Oak Harbor has expended \$40,000 for outsiders to perform a study of how best Oak Harbor could use its waterfront to attract Tourists or businesses. After however many years Oak Harbor has been an incorporated municipality, they apparently still are searching for a new identity. I say that only to draw a sharp and distinct difference between Oak Harbor and Coupeville. Oak Harbor is seeking the change that will make Oak Harbor more attractive as a place to do business or attract Tourists. Coupeville knows, understands and is willing to fight to preserve the heritage and life style that has existed for well over 150 years. The Navy comes along and now is seemingly fighting to destroy the character, charm, quaintness that is Coupeville and its Environs, with ever increasing levels of noise and noisy flying days at OLFC.

It is apparent that the place we call Coupeville and its Environs should not be burdened with any FCLP operation conducted at OLFC because the way of life there and the impact of FCLP operations is clearly in conflict with that way of life. Yet, that is what the Navy has been doing and is proposing to do up to 575 percent more. It is one thing for the Navy to expand NAS Whidbey. It is quite another to do what the Navy is proposing to do to Coupeville and its Environs. The Navy's DEIS would enlarge the sound contours reflecting Growler FCLP operations to encompass all of Coupeville for the first time ever. It would also increase from 6,100 FCLP operations conducted per year at OLFC to as many as 35,100, which represents a 575 percent increase. That would be unconscionable and intolerable and absolutely in conflict with the oft expressed lifestyle and Tourist-based economy of the quaint village that is Coupeville. The Navy's DEIS shows that the increase in acreage subjected to such an increase would impose a sound level of between 65 and more than 75 dB DNL of at least an additional 4,144 acres, a 50% increase (See Table E-1), as well as another 500-1,000 acres impacted by a contour range of 55-65 dB DNL. No reasonable person could persuasively argue that the Tourists who are drawn to Coupeville's ambiance, solace, and beauty would continue to be drawn to listen to the debilitating noise that is the noise from Growlers performing FCLP operations or that small acreage agricultural endeavors could be sustained. Tourists would flee from Coupeville in a New York second. Further, once Coupeville's economy is devastated, how will the Navy or anyone else bring it back. For the residents who now reside in or around Coupeville, the end might be near, and the Navy cannot even present publicly an even-handed, objective DEIS that mentions Coupeville's economy.

Notwithstanding the mandates upon the Navy that are included in NEPA, to respect the interests of citizens in areas affected by its plans and proposals (See Section 1, My Comments), the DEIS does not address the impacts of any of its 10 proposals contained in the DEIS upon Tourism. While it does discuss in its own terms, the "Economy, Employment and Income [and Affected] Environment" of "NAS Whidbey Island Complex" and "Island and Skagit Counties", it ignores Tourism, notwithstanding its impact on Coupeville (See Secs. 3.10.2.2; Sec. 5.4.10.3).

Even Navy literature is confounding. Included in the documents available on the Internet, there is a document welcoming newly assigned personnel with this: "Whidbey Island is about 35 miles long [actually it is far longer than that] and is ranked as the fourth-longest and fourth-largest island in the contiguous United States. Here you will find abundant recreation possibilities, from boating, hiking and biking to hunting and fishing (www.mybaseguide.com/navy/13-719/nas_whidbey_island-arrival) (2016). Then it shows its Navy side, in reciting the Navy's History on Whidbey island, with this: "NAS Whidbey Island was home to the majority [but not all] of the Navy's Prowler squadrons, and now [is] the only base for all the new EA-18G Growler squadrons [Emphasis added]. It supports 14 Prowler/Growler squadrons, 10 of which deploy to aircraft carriers, three expeditionary squadron not assigned to carrier air wings and one Whidbey-based training

squadron" (www.cnmc.navy.mil). Those Growler numbers don't include the Growlers proposed to be added to NAS Whidbey's inventory pursuant to Alternative 1, 2, or 3 per the DEIS.

Economically, the scenario I have attempted to paint in this section, if implemented, would be catastrophic to Coupeville and its Environs. Tourists would be the first to disappear. Then some of restaurants, followed by small businesses would fail. Home prices in Central Whidbey, which have never recovered anywhere close to 2006-2007 levels, would decrease even further with previously unknown levels of Navy growth at NAS Whidbey. And of course, up to 35,100 FCLP operations at OLFC.

Is this what the Navy means when it says it wants to be a good neighbor? All of this, without mentioning or considering a worthy re-location of FCLP operations to an OLF designed specifically for FCLP operations, and where there are no people living in towns nearby like Coupeville, or nearby so as to be beneath FCLP flight tracks.

Coupeville and its surrounding neighborhoods is a place that absolutely should not be burdened involuntarily, or impacted adversely, by a long-term, permanent expansion of the Navy's Whidbey island presence involving OLFC, reflected in any or all of the four proposed alternatives in the DEIS. The four proposals, in essence, would entail a unilateral exercise of power by the Navy to impose upon Coupeville and its Environs, the horrifically repetitive, incessant, and dangerous intensity of Growler noise which obviously would accompany such choice. Further, the DEIS inaccurately and deliberately mischaracterizes the intensity of that noise, which is the primary basis of civilian complaints, by choosing a computer program to model computer-projected noise characteristics and that disregards the actual decibel levels of noise, or the full annual dosage of noise that is in excess of OSHA limitations and requirements. While the Navy obviously has sufficient power to cram or jam any of the four proposals into the part of the unique, idyllic world of Coupeville and its Environs, stated very simply, that would be the wrong choice.

As an alternative, there are areas in the Pacific Northwest where a new FCLP Landing strip, station, or NAS could be constructed where there are no civilians whose lives would be adversely impacted by Growler flight tracks involved in performing FCLP operations. A new OLF also would resolve the issues that presently exist regarding the present use of OLFC. There is no doubt that if the Navy ignores these issues, it very likely will heighten the existing adverse impact upon the civilians who are the people who live in Coupeville and its Environs, by weakening or destroying the economic benefits from the Tourists and other visitors who come to Coupeville to enjoy a week, a weekend, or a day throughout the year. The Tourists and other visitors who come to Coupeville and Central Whidbey to enjoy a week, weekend or day away from the hustle and bustle of their lives wherever, would be greeted by noise beyond the levels presently existing. It is unrealistic to say that Growler noise, increased by up to 575 percent by proposals in the DEIS, would not matter.

The Tourists and visitors to Central Whidbey would be the first to flee to some other idyllic location. That could effectively damage the economy of Coupeville, whose merchants, inn-keepers, and B&B proprietors would suffer, along with restaurant owners, virtually all of which are locally owned and operated. That would create a public relations nightmare for the Navy. Tourists and visitors who come to Coupeville for a week, weekend, or day would avoid the noise because the ambiance and attraction that is Coupeville, as described in the article quoted above, could not co-exist with the Growler noise that already has generated enormous amounts of complaints and even lawsuits from activists. If the Navy chooses to make the situation worse than what reasonably could be expected, other than that the complaints and lawsuits would/

could increase exponentially and become a serious public relations nightmare for the Navy. That should not be read as a threat, but rather as an educated guess that making a choice that will exacerbate the presently existing bad situation for the residents in Central Whidbey Island, and that could impel many more citizens to join in fighting the Navy in the court of public relations and in the halls of the statehouse, the White House, and Congress.

These need not be resolved by an "either-or" solution, which the Navy seems determined to compel. Rather, it is clear that the presently existing Growler-noise based issues would be resolved by a new OLF, but so far the Navy won't even consider that as an alternative proposal, which seems to be a mandate in this instance, required by NEPA. NEPA does not require the devastation or destruction of Coupeville's chosen path of life, especially if there are reasonable alternatives, which there are as addressed in Section 6 of my comments.

The alternative of relocating OLF is simply a conclusion that follows from taking a close look at the present depth of the problem, Navy intransigence in recognizing and permanently resolving the problem, and preventing the Navy making a unilateral decision in this particular instance that would devastate not only the economy of Coupeville but investments and home values for many of us Central Whidbey Islanders. A new OLF for FCLP need not entail moving the permanent assignment of any EA-18G squadron from NAS Whidbey, but it could have the side effect of reducing or eliminating most or all of the FCLP operations performed at NAS Whidbey. Then, could not the Navy learn to co-exist with all of Whidbey Island? There would still remain an enormous amount of noise generated by high-speed, ascending and descending overflights, but those could be tolerated and endured, if not loved. Maybe even some Pilots and Crew Members of EA-18G would even move to Coupeville.

SECTION 4.

DEIS' ECONOMIC BENEFITS TO COUPEVILLE & ENVIRONS MEANS NEGATIVE IMPACT BURDENS

The purpose of this Section is to show that the Draft Environmental Impact Statement (DEIS) for continued or increased EA-18G "Growler" FCLP Operations at OLFC is a burden upon Coupeville and its Environs that will be increased bigly by the selection, approval, and implementation of any of the ten proposed alternatives set forth in the DEIS. It would be tantamount to a declaration of economic war by the Navy upon the citizens who live in the vicinity of OLFC or Coupeville.

Strong words? Let's see if I can persuade you that they are accurate. I believe they are.

The DEIS includes many many pages, figures, and charts, including two that I wish to draw to your attention. Figure 3.6-3, in Volume 1 of the DEIS, shows in geographic terms, with a gold-colored hue, the off-installation historical properties near Ault Field and OLFC, as distinguished from non-historical properties. That Figure also shows the "APE", which is an abbreviation used in the DEIS for "Area of Potential Effect." The APE is encircled by a thin sienna-colored line around OLFC, and indicates that the APE near OLFC encompasses about 40-45% of the historical properties near OLFC.

The Navy, in the DEIS, states that it uses three ranges of decibel levels, expressed as DNL's (an average that includes quiet hours of nighttime to calculate a 24-hour average), in showing and describing the impacts of the four Alternatives under consideration. The lowest range in the DEIS is the range between 65-70 dB DNL and the Navy bases that choice upon a 38-year old study by Schultz (See T. J. Schultz Synthesis of Social Surveys on Noise Annoyance, Jour. Acoust. Soc. Am., p. 377-405 (1978)) that was updated and modernized years ago bu Schultz himself as well as numerous others. The DEIS, in part, defends its use of that outdated study by stating that "research [namely the 1978 un-updated Schultz study] has indicated that about 87 percent of the population is not highly annoyed by outdoor sound levels below 65 dB DNL" and that "most people are exposed to sound levels of 50 to 55 or higher on a daily basis. In other words, the Navy contends that there is virtually no reason to include a lesser range because it would not apply to a significant percentage of the affected populations. That has been proven to be inaccurate by several researchers (See e.g., Sanford Fidell, The Schultz Curve 25 Years Later: A Research Perspective (2003); and H. Miedema and H. Vos, Exposure Response Relationships for Transportation Noise, Jour. Acoust. Soc. Am. p.3432-3445 (1998)). The 1978 Schultz study, in synthesizing data from several noise sources, assumed incorrectly that the relationship between people who were "highly annoyed" at the 60 dB DNL level remained the same regardless of noise source. Indeed, the 13% determined by the 1978 Schultz study to be "highly annoyed" was based on three distinctly different noise sources that were mistakenly synthesized for the study on the basis that source didn't matter. The sources in question were aircraft noise, road noise, and railroad noise. Twenty years later, the Miedema & Vos study (Id., at p.1998), among others, determined that there are widely differing levels of annoyance within each of those three categories of noise source: aircraft noise, road noise, and railroad noise, and provided a chart based upon updated data that verifies that point for 5 different DNL levels of aircraft noise:

DNL	Percent Highly Annoyed			Schultz Combined
	Miedema & Vos			
	Air	Road	Rail	
55	12	7	4	3
60	19	12	7	6
65	28	18	11	12
70	37	29	16	22
75	46	40	22	36

Thus, if the Navy wanted to use a threshold of 12% highly-annoyed persons, as being a sufficiently large group of citizens to draw additional contours, then the Navy should have drawn or re-drawn contours both for the 55-60 dB DNL range (12%) and the range 60-65 dB DNL(19%). Together, those two additional contours represent 31% of the highly-annoyed population subjected to the DNL's between ranges for 55-65 dB DNL and are worthy of consideration instead of relegating their views to the bin of those whose views are worthy only of being ignored and disregarded. I implore the Navy to do so before making its decision. Otherwise, it would appear that the Navy did not mean what it says in the DEIS about the 12% of the population argument referenced above; and would be ignoring fully 31% of the population highly annoyed with Growler noise within those 55-65 dB DNLs. Further, keep in mind that, consistent with the Schultz update, there are numerous studies indicating that the rate of annoyance for aircraft noise annoyance clearly is higher (i.e., a lower dB threshold) than for commercial aircraft, road noise or railroad noise. Continuing to use the 1978 Schultz study is nothing more than using the lower thresholds for persons who are highly-annoyed by railroad and traffic noise in order to minimize the threshold for persons highly-annoyed by aircraft noise.

In drawing the contour lines for the "No Action Proposal" (i.e., a continuation at OLFC of 6,100 FCLP operations per year), the Navy inexplicably doesn't use just the three ranges indicated above. Without explanation, the DEIS contains a fourth line, namely, a 60 dB DNL line (See, e.g., Figure 3.2-5). Then, in showing the effects, by contour line drawings, of the Proposal known as Alternative 1, Scenario A, the contour lines representative of the status quo of 6,100 FCLP operations at OLFC per year reflect that the contour lines showing the "No Action Proposal" has wider, greater effect at 60 dB DNL than the Alternative 1, Scenario A, proposal viewed from its 65 dB DNL contour line (Figure 4.2-5). * Maybe there is a reason. The only one I am able to see is to obfuscate and confound the real impact to support a finding that selecting Alternative 1, Scenario A, could be said in reliance on the figures above to be of "No Significant Impact."

*It also shows that contour lines, which express a 24-hour average dB DNL level for the "No Action Proposal", are unaffected by high temp FCLPs that of necessity would mean a higher intensity within FCLP operations within the same period of time less than 24-hours, or a higher number of FCLPs on a day, which would increase the noise average for that day. If that calculation was made. I'm not sure it was made.

But, on second thought, maybe there is one other impact. The Navy's preference for discussing no DNL range below 65 dB DNL is belied by its use of a contour line based on the 60 dB DNL as reflected in several Figures in the DEIS, including Figure 3.2-5, that would change the APE numbers which are used in several instances to establish an easily understood visual aid to understand the impact of the effects of any of the four proposals on such instances. Similarly, redrawing the contours relative to OLFC activities would enlarge the contours if the contours are redrawn to include "lobes" as presently done for Ault Field flights (see my discussion in Section

entitled "DNL and It's Value). At this point, I invite you to look at each of Figure 3.5-3 Parks and Recreation Areas in the NAS Whidbey Island Complex Affected DNL Noise Contours; Figure 3.6-1 Location of Historic Properties; and Figure 3.6-3 Location of Off-Installation Historic Properties. Starting with Figure 3.6-3, I only wish to discuss the circle around OLFC that is a sienna color and that overlaps the Historic Properties near or in Coupeville. The sienna-colored line represents the APE, the area of potential effect of the DEIS. Rather than tackle the discussion in the DEIS, I want you instead to refer to Figure 4.2-5 which shows contour lines of 60 dB DNL, both for the No Action Proposal, for the Alternative 1, Scenario A, proposal, and for the Alternative 1, Scenario A, proposal for high tempo FCLPs. Now, for each of those lines, compare the location of the Historic Properties close to Coupeville, and notice that each of those contours would place more of those properties within the noise contours. Finally, visualize in the top left corner of Figure 4.2-5 where a 55 dB DNL contour line would/should be drawn around Coupeville. A 55 dB DNL contour line within which 12% of the Population would be "Highly Annoyed by Growler noise is significant, right?"

If you will perform the same exercise for Figures 3.6-1 and 3.5-3, you will see that a 55 dB DNL would become more burdensome for the Navy to support a finding of "No Significant Impact." In my opinion, while figure 3.5-3 shows no APE contour, you can understand the impact that a 55 dB DNL contour line might have on a person wishing to enjoy the outdoors, including Tourists, visitors, and residents of Central Whidbey.

Somehow, to my way of thinking, that place we call Coupeville, should not be burdened with any FCLP operation conducted at OLFC, certainly not a burden that is increased by any measure. Yet, that is what the Navy is proposing. It is one thing for the Navy to expand NAS Whidbey. It is quite another to do what the Navy is proposing to do to Coupeville. According to the Noise Contours drawn for Alternative 1, Scenario A, the contours (similar to Scenario A for Alternatives 2 and 3), would be enlarged so that they would encompass all of Coupeville for the first time ever. It would also increase from 6,100 FCLP operation conducted per year at OLFC to as many as 35,100, which represents a 575 percent increase. That would be unconscionable and intolerable. By the Navy's DEIS, the increase in acreage subjected to such an increase would impose a sound level of between 65 and more than 75 dB DNL of at least an additional 4,144 acres, a 50% increase (See Table E-1), as well as another 500-1,000 acres impacted by a range of 55-65 dB DNL. No reasonable person could persuasively argue that the Tourists who are drawn to its ambiance, solace, and beauty that is Coupeville and its Environs would continue to be drawn to listen to the debilitating noise that is the noise from Growlers performing FCLP operations. They would flee from Coupeville in a New York second. Further, once Coupeville economy is devastated, how will the Navy or anyone else bring it back. For the residents who now reside in or around Coupeville, the end might be near, and the Navy cannot even present publicly an even-handed, objective DEIS that discusses the impact of 35,100 FCLP's executed at FCLP upon the Tourist industry needed by Coupeville for its way of life, its character, and laid-back attraction to thousands of Tourists.

Figure 3.6-1 Location of Historic Properties

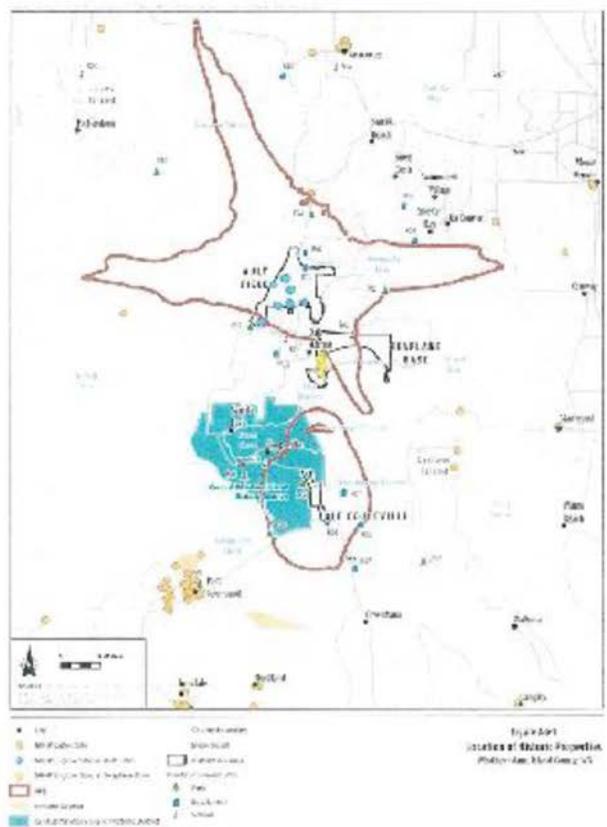
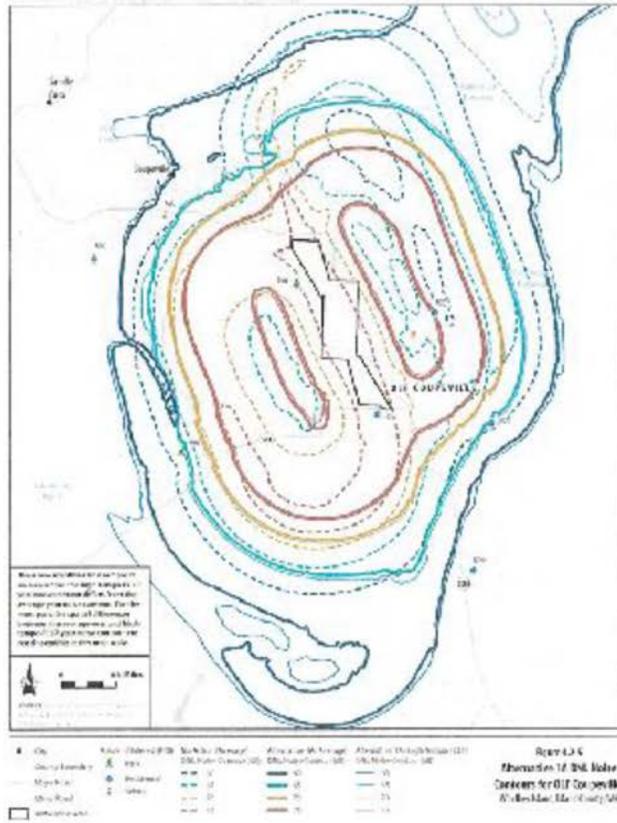


Figure 3.5-3 Parks and Recreation Areas in the NAS Whidbey Island Complex Affected Environment, ONL Noise Contours

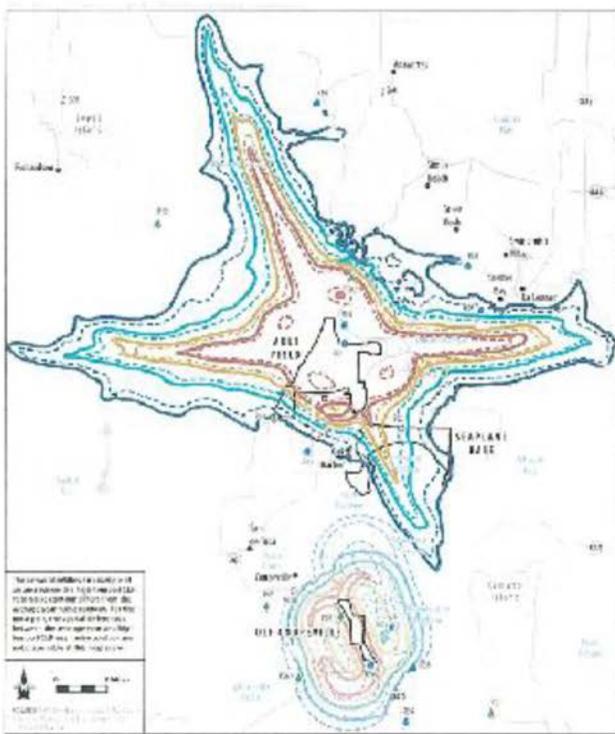


Figure 4.2.5 Alternative 1A DNL Noise Contours for OLF Coupeville



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Figure 4.2-4 Alternative 1C DNL Noise Contours for Ault Field



No contour of 65dB or greater is shown on this map because of the high level of noise generated by aircraft operations at Ault Field. The contours shown on this map are based on the noise contours for the Ault Field. The contours are based on the noise contours for the Ault Field. The contours are based on the noise contours for the Ault Field.

Symbol	Description	Value	Value	Value	Value
●	65 DNL	65	70	75	80
○	70 DNL	70	75	80	85
○	75 DNL	75	80	85	90
○	80 DNL	80	85	90	95
○	85 DNL	85	90	95	100
○	90 DNL	90	95	100	105

Figure 4.2-4
Alternative 1C DNL Noise
Contours for Ault Field
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SECTION 5.

ELECTRONIC WARFARE AGAINST ONE CIVILIAN?

Whose Actions Caused Persistent Destruction Over Time of Electronic Equipment in My Home? A Documentary Accounting.

Having grown-up in a small idyllic town in the picturesque mountains of Northern California, mostly after the conclusion of WWII and during the relative boom years of the Eisenhower Presidency, it was "normal" for a young man (me) who got his yearly fill of fishing, hunting, and playing football, basketball, and baseball, to put on my vision of an "Ivory Tower" people who had achieved status in society and in my personal world - such as school teachers, coaches, members of the military from my hometown, like ██████████ an Air Force Pilot in the 50's, ██████████ a Navy Pilot who went to Norway in the 1950's and came home with a striking blonde bride and became my hero, various respectable politicians, ministers of the teachings of the Bible, and numerous other types and categories of people. One by one, events committed by individuals in virtually all walks of life, lowered substantially the people on my Ivory Tower. Fast forward, if you will, to the early 2000's to my home on Whidbey Island.

In Mid-2006 my long-term wife, ██████████, and I encountered events that drew into question, at least in our minds, the quality of the electricity being delivered to our home. We contacted PSE and, after describing in detail the facts causing our concerns, the PSE came to our house, performed a number of tests over the course of a couple of hours or so and indicated that the quality of the electrical service was perfectly normal. Nevertheless, they hooked-up monitoring equipment and tested the quality of the electricity for approximately two weeks. After that period of time, they examined the recorded data and indicated that the testing revealed nothing diabolical or abnormal.

Thereafter, my suspicions and concern remained and I contacted a licensed, commercially-rated Electrician, CK Electric, and described the problems I had encountered and the testing that had been done by PSE. And I asked about the installation of a "whole-house surge protector." I opted to incur the expense of \$576.11 to have the surge protector installed in the Summer of 2010, which protects our entire home and its contents from surges in electrical power service from PSE. Sadly, that did not coincide with the termination of my problems. But I can say that, as the PSE indirectly predicted, that whole house surge protector has not been "tripped." Not even once in six plus years.

I then began to discuss possible sources of my problems with other people. A couple of people suggested that the source of the problems I had encountered, over time, plausibly could be the United States Navy, with their vast and powerful array of electronic warfare equipment. By this time, we had realized that each of individual devices that had been destroyed beyond repair were devices that received or transmitted information delivered wirelessly, via Wi-Fi or radio signals within my home. Over time, subsequent episodes resulted in the further destruction of electronic equipment installed in my home, at random times.

Further, I had checked with the neighbors who live in my subdivision consisting of 24 lots of about one acre each. Not a single, other person or family, has incurred any such or similar losses.

Ultimately, [REDACTED] (the Diplomat) called NAS Whidbey and was passed-off to a couple of different people, apparently qualified to discuss our theory that personnel aboard a Prowler or Growler, or both, while flying overhead of our home, may have unilaterally declared Electronic War against us by utilizing their Electronic Warfare equipment, covertly or overtly, intentionally or unintentionally, to destroy electronic equipment in my home, having a combined value of more than ten thousand dollars.

While these episodes may sound preposterous and beyond the pale, no one can deny that the events occurred or that the expenses we endured, incurred, and paid over time (and for which we have every original receipt) are real. And no one in my neighborhood or elsewhere in sphere of my knowledge on Whidbey Island has suffered similar losses. And no one has offered a reasonable alternative conclusion. Who else on Whidbey Island has that capability and opportunity?

What is Electronic Warfare? Electronic Warfare utilizes electromagnetic energy, which is energy that is reflected or emitted from objects in the form of electrical and magnetic waves; and can have enormously powerful destructive effect. On the good side, Electromagnetic energy is utilized by computers, cell phones, microwaves, tv remote controls, weather stations, cell phone towers, radars, remote controls, wi-fi's, bluetooth, and other similar home devices for valid communications purposes. It also is utilized by militaries around the world to facilitate ground to air, air to air or ground, and other types of radio communication, radar, and radio and other controlled guidance systems (for weapons like ground to air missiles). Electronic Warfare utilizes electromagnetic energy in beams and bursts to destroy, control, or disable an enemy's ability to use its myriad electronic systems, which in turn facilitates relatively unimpeded access to electronic equipment by the U.S. military in conducting its military operations. In the Pacific Northwest, the Navy practices detecting, identifying, and locating the kinds and types of electronic signals that typically may be expected to be encountered when flying above hostile territory. Like my home?

One question that arises, naturally, is whether someone in the Navy did this to my [REDACTED] and I. My answer is whom else flies around our neighborhood at low or even moderately high altitudes, and at times unimpeded by supervision? Opportunity exists when Growlers are departing from or arriving at Ault Field for or from points beyond Whidbey Island, and just before entering the FCLP patterned flights or when exiting control by OLFC operations personnel and before making contact with Whidbey Approach. There is no one but the Navy, in my opinion, around Whidbey Island. They have the equipment, they have the opportunity, they have the time, but do they have the motive?

I have spent hours upon hours asking myself this question: What have I done in my past that would motivate someone to commit an act that could lead even to a dishonorable discharge at a minimum, or to criminal charges? In the 14 years I have lived on Whidbey Island, I have never met a single pilot, other than a couple of helicopter pilots whom I talked to in the presence of [REDACTED] on the day a friend and I, along with [REDACTED], flew an amphibious de Havilland Beaver, circa 1944, to the Seaplane Base, deployed the wheels at an appropriate time, and crawled up the concrete ramp to a standing ovation (there were no chairs!) at the celebration of the 75th Anniversary of something Navy, maybe Navy Aviation. No suspects there.

I can only come up with three potential and plausible answers.

First. On February 15, 2006, I had shoulder surgery performed in Seattle by [REDACTED] to reconnect the rotator cuff on my left shoulder that had been ripped off the bone in a fall involving

a collapsed ladder. Prior to the surgery, I indicated to [REDACTED] that I had been a pitcher and that, while I had never received a call from a team in the Big League, I didn't want to tell them, if they called, that I could not go because of him. So, he drilled three holes through the appropriate bone, used titanium thread to tie the affected tendon to the bone, used a medical rasp to generate bleeding to foster scar tissue and the shoulder was far better than before. After a few weeks, the Doctor prescribed physical therapy, which was performed on Whidbey Island by a Prowler pilot's wife. While his wife and I had an immediate connection that permitted us to communicate easily and willingly with one another, neither of us ever made a "move" to explore or commence a romantic relationship. For one thing, there was an approximately 25-30 year difference in our respective ages. Clearly, my age was the highest number. For another, I have been married to the same woman, [REDACTED], for over 46 years and she is my best friend, and never have I betrayed her or our wedding vows. In point of fact, I had even broached the subject with the Therapist of her coming over for dinner, along with her Pilot husband and their kids. She didn't think the Pilot would be interested. That idea apparently was dead on arrival. That is the only relationship to which I can point to, and it does not seem much more than far-fetched.

While I have zero evidence that this particular Pilot or his Crews (over time), or friends of this particular Pilot who themselves are Pilots or Crew Members did anything, I remain nonetheless the victim of having had on numerous occasions losses that are difficult to explain, absent Navy involvement, which I acknowledge is a possibility as well. I will say, also, that during my very satisfying 6-year stint as a Regular Officer in the United States Air Force (my letter of resignation of my commission was accepted but delayed for one year because of Vietnam and the need for Officers with my AFSC (Air Force Specialty Code), according to President L. B. Johnson). I spent a full year on a remote assignment in Asia and dealt personally with the extraordinarily high number (nearly 30 percent, as I recall) of Enlisted Personnel under my direct supervision who had received Dear John letters from their spouses; and a higher percentage for personnel who received Dear John letters from girl friends. Military life exacts a high price far too often for both Officers and Enlisted Personnel because of temporary duty and permanent changes of duty in remote locations. And it is tough to be away from home and not know or understand changes that may be occurring. That, however, even if true, would not excuse what has happened to my wife [REDACTED] and I in regard to the damages we have sustained.

Second. The second potential source is that my home may have been a case of mistaken identity. I do know one of my neighbors has, at some point in the past, been an active member of an activist group opposing the utilization of the OLFC for any purpose (and I have only recently reached the same conclusions regarding OLFC). I instructed my wife, [REDACTED] (to the extent I am able to give her instructions) that, when she called NAS Whidbey, to discuss the history of our electronic equipment losses, and to also ask the Navy representative whether he knew or knew of our neighbor. He answered in the affirmative and offered his condolences. That may be humorous, but it confirms the possibility that someone, or more than one someones, may have thought they were bombarding my neighbor's home with Electronic Warfare energy, instead of mine. The Navy representative called back a day or so later, and while he would not confirm that he had discovered evidence implicating the Navy or Navy personnel, neither would he deny Navy or Navy personnel involvement. Consider this scenario: Suppose, on the way to or from a training site (Eastern Washington, for example) where Electronic Warfare practices had occurred on several occasions, the crew or Pilot of a Prowler or Growler, or both, flew over my house and directed a beam or burst of destructive electromagnetic energy at my house. How could that be detected, absent monitoring, supervision, and concern for people like me? As a possibility, I have had that confirmed.

Third. There exists the possibility that the source is pure spite, meanness, and/or a "Screw Him" attitude that should not exist. It is clear to me, that there has developed on Whidbey Island an attitude toward people who live in the OLFC vicinity that is, at best, unfortunate. Many of us, however, (probably the majority of us), are NOT anti-Navy people. We are as God-fearing and as honorable as any of the people who live in Oak Harbor or that are stationed at NAS Whidbey. We have lived productive lives, raised families of children who are excelling in life, and many of us served in the Armed Forces of the United States. For example, one member of my immediate neighborhood proudly flies his Marine Flag daily and served as an Officer and saw combat in Korea. Another member of my neighborhood was a Navy Officer and flew as a "back-seater" in an F-4 in Vietnam; and his Pilot during that service also lives a few miles from my neighborhood. As for me, I served nearly 6 years with a Regular Commission in the United States Air Force from 1964 - 1969, a fun time to be in the military.

A reading over the years of the letters to the editor of the various Whidbey Island Newspapers (an exercise I gladly refrain from participating) reveals excesses on the various sides of the OLFC issues; and reveals a clearcut lack of understanding and empathy. There is no attempt of which I am aware, where the Navy has taken a Leadership role in resolving this unfortunate split in the civilian community of Whidbey Island and, if the Navy pursues any of its recommendations in regarding to increasing flights that utilize Whidbey OLF, that split will become greater for reasons discussed elsewhere in My Comments. In the preparation of the latest iteration of the EIS for Prowlers/Growlers, the Navy has engaged in deceit instead of balanced truth, manipulated data instead of obtaining and using actual data, and ignored the obvious on numerous occasions.

Is it beyond the realm of possibility, given the Navy's apparent attitude reflected in its incessant demands and support of policies that will destroy the ability of people who live in Coupeville or its environs, to enjoy life or even sell their properties and flee Whidbey Island, coupled with strong opposition to the Navy's policies and positions, that a group of Growler Pilots and Crew have been enjoying a "game" of occasionally zapping my home (and perhaps others, as well) with their Electronic Warfare equipment? My answer is "No." What would be the harm if it only involves those worthless persons (██████ and I) who live in a big house with a big garden on the coastline, but under numerous flight paths of arrivals, departures, and FCLP's, yet near OLFC? If so, it is highly unlikely that they have been caught or disciplined. But there are damages that have been sustained and the Navy cannot say that there are not.

Of course, as of this date, I have no evidence other than circumstantial that the Navy, or that Navy personnel, took the action that has cost me several thousands of dollars. But I remain hopeful that someone with a conscience will provide such evidence in the near future. But I believe there are times and opportunities for such action to have been taken, as discussed elsewhere in My Comments.

To date, the losses I have sustained are as follows:

In 2002, I had installed two commercial-grade garage door openers that had remote controls. Both of the openers were "fried" on the same date, but neither of the remote controls were affected. Two new ones were installed on May 24, 2007 at a cost of \$617.31. All of them utilized remote controls to send a signal to the opener to close or open.

An Onkyo TX-NR807 receiver, which cost \$844.67, and which utilized Wi-Fi to communicate with a computer, was fried.

On June 13, 2008, an Apple Airport Extreme router was purchased at a cost of \$179.99 to replace one that had been "fried".

On February 15, 2009, an HP laptop computer was purchased for [REDACTED] at a cost of \$729.99. It was fried a couple of years later. It utilized Wi-Fi. An Apple MacBook Pro was purchased at a cost of \$1,621.74 on April 20, 2016, and still works.

On October 17, 2009, a new TV was purchased to replace one that suddenly stopped working, at a cost of \$2518.48. Both utilized Wi-Fi.

A Logitech Harmony 900 Remote Control which transmitted signals to the Television and cost \$305.80 on October 17, 2009, was "fried."

A third TIVO was purchased on March 17, 2015, to replace one that was fried. Its cost was \$393.28. It utilized Wi-Fi.

On February 25, 2014, another Airport Extreme router was purchased to replace the one listed above as item 3, at a cost of \$216.91.

In 2010, my wonderful 17"-screen Fujitsu LifeBook (Laptop) was "fried" suddenly. It cost \$3,117.

I replaced it on September 22, 2012, with a MacBook Pro Laptop at a cost of \$2199. Between 2010 and September 2012, I used an HP Pavilion Elite 112y that cost \$900. Both are/were Wi-Fi.

The total cost of the equipment that was fried was well over \$10,000, excluding the equipment that could be said to be upgrades, but the cost of which was prompted by one of the several destructive episodes we have suffered.

[REDACTED] has kept actual, originals of all receipts mentioned for the 9 items enumerated, as well as for the whole house surge protector.

If asked, I will sign this document under Penalty of Perjury.

During the same period of time, none of my non-Wi-Fi equipment has failed.

Moreover, we have not experienced any episodes of destruction since early 2015. Maybe some Leadership or Supervision was asserted with a strong message? Maybe there is a new Commander that has made some changes? Or maybe some Navy records already have revealed some suspects? Maybe some discipline was meted. Whatever, I would be satisfied with a letter of apology, but I won't hold my breath.

If you wish to discuss this matter further, you may contact me, [REDACTED], at [REDACTED].

I regret to say that there no longer is an Ivory Tower in my vision.

SECTION 6.

ALTERNATIVES TO OLF COUPEVILLE

Continued use of OLF Coupeville (hereafter OLFC) to conduct FCLP (Flight Carrier Landing Practice) operations, even at the current level of 6,100 FCLP operations per year, is incompatible with the civilian land development that already exists in the vicinity of OLFC. Many of the homes in the Civilian Communities surrounding OLFC and within the Coupeville City Limits have existed since the 1940's, and others have been constructed since then with no effective or honest effort on the part of the Navy, the County Government, or anyone else to warn builders and home buyers of the extent and intensity of Growler noise levels. That is important to understand. If an independent arbiter were to consider the relative equities involved between the conflicting parties of homeowners, the Navy, the County Government, and builders and realtors, it seems clear that, in the absence of effective warnings and disclosures, the weight of the relative equities favors the homeowners. The Navy can build an OLF facility elsewhere for the conduct of FCLP operations and where there will be no unwilling civilians, the Navy can keep its aircraft based at Ault Field and NAS Whidbey, and the Civilains who live near OLF can begin to enjoy the life they thought they had in their present homes.

Further, unless a decision is made to totally disregard the health dangers that presently exist for the civilians that live beneath the aircraft performing the FCLPs, the possibility of increasing FCLP operations by any amount should be a non-starter. Please be informed that there are no EA-18G Pilots or Crew, or families of either the Pilots or Crew who choose to live in any of the neighborhoods within the high decibel or otherwise dangerous zones beneath the FCLP flight paths. Indeed, even the military housing made available for those persons assigned to NAS Whidbey, and their families, are not within the flight paths for FCLP's occurring at NAS Whidbey. In other words, only Civilians, the vast majority of whom have no involvement or interaction or interdependence upon the Navy in any economic sense, live within the OLFC Danger Zones.

While the Navy has cynically avoided even mentioning the possibility or plausability of securing and constructing a new and state-of-the-art-appropriate OLF expressly for FCLP operations, that is a fundamental issue that Congress, The President, and the Secretary of Navy should demand, absent the adoption of a new, cooperative attitude by the Navy regarding that issue. That is to say, the insanity that has destroyed and is continuing to destroy the ability of Civilians to enjoy their lives to the fullest, as well as their wealth in the form of real estate investments, and that subjects those Civilians to more noise terror than is imaginable unless it is actually endured and experienced in person, should be terminated forthwith.

An acknowledged declaration of Vice Admiral Troy M. Shoemaker portrays the relative singularity of the Navy's attitude toward civilians who live beneath the flight tracks of FCLP operations at OLFC: It was filed as Document 48, on May 29, 2015, in the United States District Court for the Western District of Washington at Seattle, in Case No. 2:13-cv-01232-TSZ, and reads in part as follows: "denying electronic attack pilots the realistic training available at OLF Coupeville would mean asking them to flawlessly execute complex and dangerous landings on the deck of a moving aircraft carrier without having performed the same procedures in training ashore under circumstances that, as closely as possible, replicate landing on an actual aircraft carrier at sea. There are alternatives to using OLF Coupeville, but none of those alternatives

provide the flexibility required for the scheduling and execution of local . . . FCLPs, nor do they provide the most realistic training environment. . . .”

Both statements are conclusory in nature and offer no evidence in regard to OLFC. He mentions “alternatives” but without clarity of anything but the singular notion that “alternatives” is a four letter word. You cannot tell if he is thinking about existing landing facilities that are alternatives, or places where presently there are no landing facilities but state-of-the-art- landing facilities designed for FCLP could be constructed. Moreover, there is nothing at OLFC that moves like an aircraft carrier moves. There are groves of tall Douglas fir trees, some taller than 100’ located on private property to the north of runway 14 and to the south of runway 32. There is the main highway of Whidbey Island, State Highway 20, that is adjacent to OLFC on the east side. On the east side of the runways, there is another road, Keystone Hill Road. There is Patmore Drive that is adjacent to OLFC on the north and west of OLFC. Thousands of cars per day travel that highway and roads. There is a sports facility close by that is utilized for childrens’ sports events, that is the location of one of the POI’s for the DEIS. I could go on, but my point seems clear, when I say that if the Navy’s intransigence regarding taking a long look at an alternative location is terminated by common sense or by, for example, a new Secretary of the Navy, or of the Department of Defense, or by our new President of the United States, the inaccuracy of Admiral Shoemakers claims could shine even more brightly.

If, on Government land, reachable by flying in an easterly direction in an EA-18G in less than 10 minutes, a state-of-the-art Outlying Landing Facility is constructed, it could be constructed with design elements that exist nowhere on earth, including OLFC. It could be constructed in a flat area of land having no trees, having no roads, with distracting car lights at night, surrounding the runways, having no civilians bearing the burden of living in the vicinity, and having no innocent children playing sports with unprotected ears, or with pregnant mothers unable to protect the developing ears of their fetuses, beneath FCLP flight tracks. Moreover, FCLP’s could be scheduled without consideration being given to conflicting events being held in Coupeville simultaneously with the the timing and conduct of FCLP’s. And no little town in America seems to have more events and celebrations or art shows throughout the year than Coupeville, in no small part because Tourism goes to the heart of Coupeville’s economy. And Coupeville’s way of life, which is far different from life at Ault Field or Oak Harbor, has existed long before the Navy first landed on Whidbey Island. Coupeville was established in 1851, is the second oldest city in Washington, and has been the County Seat since 1881. The Navy’s bullying tactics regarding the use of OLFC, originally intended only as a temporary facility, threatens the vitality of Coupeville’s economy and its Tourist-based foundation. How many Tourists do you know who wish to spend a week or two or a day or two listening to the roar overhead of Growlers flying low-level FCLP’s?

It is not difficult to envision a new OLF that would provide a far more realistic training environment than presently exist at OLFC, and continue permit all the U. S. Growlers to be based at NAS Whidbey. Presently, more training involving flying occurs away from Island County than that which occurs either at Ault Field or OLCF. Take a look at the flight tracks for arrivals and departures from Ault Field, and you will see that some 53,100 such flights occur throughout the year that do not involve FCLP’s (see Table 3.1-3). That doesn’t include any projections once more Growlers arrive at NAS Whidbey.

Parenthetically, I hope the Navy knows what it is doing basing all the Growlers owned by the USA at one location (Ault Field) in an unprotected Harbor facing West.

Admiral Shoemaker, in his Declaration, also takes the reader through the sequence of events essential to a successful landing on an aircraft carrier. He states: "Landing a tactical aircraft on a moving aircraft carrier at sea poses enormous challenges for even the Navy's most experienced aviators. Aviators must perform a series of maneuvers in a very precise sequence, at specific altitudes, speeds, and power settings, which are very different from a conventional landing. To land on an aircraft carrier, aviators first fly 180 degree descending turns in an oblong "racetrack" pattern over the aircraft carrier. They enter the racetrack flight pattern at 800 feet above seal level and then descend to 600 feet. Aviators then turn and descend at 100-200 feet per minute to arrive at the start point of the final descent. During the final seconds of the landing, aviators make constant power corrections to achieve the exact descent angle, alignment and airspeed so that the aircraft arresting hook touches down in a precise location on an aircraft carrier runway that is moving away from them and can be pitching up and down while also rolling side to side. The aircraft arresting hook then catches an arresting wire, stopping the aircraft, which is moving at over 100 miles per hour, in less than 300 feet. When the aircraft touches the flight deck, aviators actually add power (rather than braking) so that the aircraft can immediately take off again if the aircraft's arresting hook misses the arresting wire. . ."

"Aviators perform this entire complex landing sequence while maintaining a 45 to 60 second interval between aircraft.

The requirements for flying at a precise descent angle, and with a proper bearing alignment and airspeed is the same requirement commercial and private pilots numbering into the thousands of pilots encounter and demonstrate while landing commercial and private airplanes safely at commercial and private airports in inclement and foggy conditions, where you cannot even see the airport until you have descended to a level below the occluded visibility level. There are avionic instruments that simplify the process greatly, but it is true that landing in a fashion that includes a precise spot, as is the case with landing on an aircraft carrier, isn't usually essential in the commercial and private flying world. Further, the Navy's safety record for aviators landing on aircraft carriers is quite high and good, and I would point out that only the Growlers use OLFC. OLFC isn't essential to F-18's and other myriad aircraft that land on carrier decks. OLFC is "essential" only because the Navy has made it so, at least in the collective Navy mind, where only one view is voiced - that of the highest ranking Commander. At least publicly.

Admiral Shoemaker's Declaration also contains a narrative about nighttime landings: "Nighttime carrier landings are even more challenging than daytime landings. At night, aviators lack the visual cues they rely on during daytime landings. At night it is often impossible to discern the horizon or the ocean due to the complete lack of ambient lighting out at sea. The inability to make a determination of relative motion can result in vertigo and confusion. Aviators must rely heavily on their flight instruments and their training. Thus, it is critical to continue this training in an ideal location such as OLF Coupeville, where ambient lighting is minimal, thus replicating the demanding carrier environment as closely as possible. . ."

With the main Whidbey Island highway, and other roads virtually surrounding OLFC, along with the 400 or so homes at the runway 32 end of OLFC and hundreds of other homes and even a well-lit terminal and home base of Whidbey Island Transit, a taxpayer-funded Island-wide bus service center and maintenance center for dozens and dozens of buses of all different sizes, it is a stretch to say that ambient lighting is minimal. It is if you compare it to downtown Seattle at night, but it isn't if you compare it to a carrier at sea.

Admiral Shoemaker's narrative clearly emphasizes the complexity and inherent dangers of executing a perfect landing of an airplane at a particular spot on an aircraft carrier, as well as

the desirability of ingraining the entire process of such landing deeply within the reflexive parts of an aviators mindset that can only come from repetitive practicing. I get that. I live it, at least vicariously by living beneath flight tracks of FCLP's at OLFC. And I get that a Growler weighs in the neighborhood of about 48,000 pounds and has a top speed far in excess of the speed of sound, and I never have heard in sonic boom on Whidbey Island. What I don't get is that Admiral Shoemaker flatly ignores the effects of living with 6,100 FCLP operations per year upon my body, my mind, my longevity, my enjoyment of life, my inability to enjoy my retirement and on and on. No one in the Navy, including Admiral Shoemaker, appears to give a hoot about me or my wife or my neighbors. Instead, all the Navy personnel below him in rank all seem to support the same biased, manipulated documentation that exists in the current and in former DEIS's regarding first the Prowler and now the Growler. Moreover, their DEIS, which is not certified under penalty of perjury, doesn't rely on actual and factual measurements (that are verified by an independent and reliable contractor or verified by civilians that are impacted by such measurements, as with available evidence of verification in the United States Air Force), but rather solely upon computer projections that utilize software that is capable of manipulation as is the case with virtually all software. If it is written by a human, it can be changed or "fixed" by a human). My position is that the Navy is not honorable in its zeal to foist upon civilians levels of noise that are worse than the noise levels now costing the Japanese Government lots of money because of military aircraft noise levels that are intolerable in that venue. In that venue, there are a couple of articles, one very recently, that seem pertinent and may even shift more and more FCLP's from Japan toward Whidbey Island and OLFC. Here are some of those articles:

"Japan gov't ordered to pay more in damages over U.S. airbase noise

"TOKYO, Dec. 1 (Xinhua) -- A high court on Thursday ordered the Japanese government to pay some 950 million yen (8.3 million U.S. dollars) in damages to a number of residents near the U.S. Futenma air base in Okinawa prefecture for aircraft noise.

The Fukuoka High Court's Naha branch upheld a former district court ruling ordering the central government to pay damages but raised the amount of payment from around 754 million (6.6 million U.S. dollars) previously to some 950 million yen.

Some 2,200 residents filed the suit in 2012 with the Okinawa branch of the Naha District Court against the government, complaining of emotional distress and negative impacts on the health caused by the aircraft noise and demanded 1 billion yen in compensation.

The district court ruled in June last year that the government should pay a total of some 754 million yen in damages to around 2,100 of the plaintiffs. Both the plaintiffs and the government appealed the ruling.

A separate lawsuit was filed by 3,395 residents who were not plaintiffs of the previous suit. The district court made a ruling last month and ordered the central government to pay around 2.46 billion yen in damages to the residents, though rejecting their demand for a halt to flights at the base.

The Futenma air base is located in downtown Ginowan city, Okinawa Prefecture, surrounded by residential areas. Local residents have been concerned over flights at the air base causing noise, air pollution and endangering public safety, especially after the crash of a Marine Corps CH-53D transport helicopter on the campus of Okinawa International University in 2004 .

The Japanese and U.S. governments have been seeking to move the Futenma base from Ginowan to the less-populated Henoko coastal area of Nago. The people of Okinawa, however, demand the Futenma base to be relocated outside the prefecture.

Okinawa hosts some 75 percent of U.S. bases in Japan while accounting for only 0.6 percent of the country's total land mass.' [Emphasis added.] (Source: Xinhua 2016-12-01 22:22:19; [news.xinhuanet.com/english/2016-12/01/c_135874026.htm])"

Earlier in 2015, the Japanese Press wrote this news report: "YAMAGUCHI – The Yamaguchi District Court on Thursday ordered the state to pay noise pollution damages to residents around a U.S. air base in Yamaguchi Prefecture but rejected calls to suspend joint flights.

The decision by the court's Iwakuni branch was the first noise ruling concerning Marine Corps Air Station Iwakuni, which is jointly used by the U.S. military and the Self-Defense Forces.

A total of 654 residents filed the suit in 2009, demanding roughly ¥1.8 billion (\$15 million) in compensation for past noise as well as the suspension of some flights.

Presiding Judge Hiroshi Mitsuoka said the court recognized that the plaintiffs "suffered psychologically and sustained health damage" because their ability to hold conversations and sleep was disrupted by noise from the base.

But the court limited the scope of compensation to past damage, deeming there was insufficient data to calculate future damages.

It also turned down the plaintiffs' demands to cancel the plan to transfer U.S. carrier-borne fighter jets to Iwakuni from Naval Air Facility Atsugi, in Kanagawa Prefecture, in 2017 and to impose a total flight ban on the MV-22 Osprey tilt-rotor transport aircraft. . . .

The top government spokesman also said the state was working to alleviate the burden of hosting U.S. bases while maintaining their deterrent power.

Itsuo Yoshikawa, the plaintiffs' lead lawyer, said the ruling was a significant first step toward eliminating noise at the base but added "it was by no means satisfying."

Mitsunori Yoshioka, a 69-year-old plaintiff, said, "It wouldn't be a fundamental resolution unless the flights of military aircraft are suspended."

The plaintiffs live in an area where noise levels register 75 or higher on the Weighted Equivalent Continuous Perceived Noise Level index, an international environmental measurement.

The figures should be at 70 or lower in residential areas and at 75 or lower in commercial and industrial districts under Japanese government standards. . . .

The Iwakuni case has attracted public attention because the base is expected to host 59 fighter jets from Atsugi air base as part of a road map for the realignment of U.S. military forces in Japan, which was agreed to by Tokyo and Washington in May 2006.

The Iwakuni base is expected to become the largest U.S. base in East Asia through the realignment.

Thursday's ruling is perceived by some as a retreat from the Yokohama District Court ruling in May last year, which ordered the suspension of SDF flights at Atsugi air base, as well as the Tokyo High Court ruling in July that upheld it.

The Yokohama court ruling was the first to order damages payments for future noise until the end of 2016, while taking into account the fighter jets from Atsugi that are planned be relocated to Iwakuni." [Emphasis added.] (http://www.japantimes.co.jp/news/2015/10/15/national/crime-legal/court-orders-state-pay-damages-noise-iwakuni-base-flights-not-banned/#.WJN_ZbGZNmA).

It is only a question of time before a sufficient amount of evidence becomes available that similar lawsuits surely are bound to become a fact of life on Whidbey Island. When the Navy loses confidence of people like me, who have a history of excellent and productive military service and who are not looking for a quick buck, there is a serious problem. Ignoring it will not work any longer. Neither will it go away, short of finding an OLF and relocating the burden that is living near OLFC to that OLF, which could be designed to be and could become an actual, existing ideal OLF. While keeping however many Growlers the Navy wishes to keep at NAS Whidbey and Ault Field.

The following are some of the "Alternatives" that exist or could exist, that would alleviate the otherworldly plans the Navy has for foisting dangerously high and debilitating levels of noise on Civilians by adhering to its "Nowhere but OLFC" policy:

1. FCLP Operations Carriers. Thinking “outside the box” for a moment, there is an alternative to OLFC that, in my opinion is worthy of consideration. It is not difficult to reach the conclusion that the OLFC has a limited future life for Navy FLCP operations, the most burdensome aspect of Naval Aviation when the noise generated by those operations is foisted upon a civilian community that has virtually zero interrelationships with the Navy and that receive virtually zero benefit from the Navy other than the benefits to our country of having Armed Forces. Just as it would be unreasonable for civilians who live close to a gunnery range to be subject to being victims of collateral damage from gunnery practice, it also is unreasonable to expect civilians who live below FCLP operation flight tracks to be subject to becoming collateral damage victims of hearing loss, organ damage or destruction, adverse cognitive consequences, and other adverse physiological adverse impacts. Or for fetuses conceived and developed in wombs that happen to live below those flight tracks to be subjected to possible life-long consequences. Expecting a new and ideal FCLP landing strip or two seems like a small step instead of a large one when considering that the cost of a new landing strip might be less than the cost of a single EA-18G Growler.

Former Navy Pilots, who have retired on Whidbey Island, confirm and affirm that the best possible practice landing facility to enhance a pilots ability to execute a safe landing on an aircraft carrier is an aircraft carrier. That is because it is perfectly duplicates landing on an aircraft carrier, unlike a landing strip like OLFC that is surrounded by homes, roads, thousands of mature Douglas Fir Trees, and is 200 feet above sea level and surrounded by a highway and roads. Even as far back as during World War II, the Navy actually thought “outside the box,” during a time when land was far more under-developed and inhabited than it is today. Nonetheless, to facilitate the training of pilots for take-offs and landings on aircraft carriers during World War II, the Navy purchased two Great Lakes side-wheel paddle steamers and converted them into freshwater aircraft carrier training ships. Both vessels lacked hangar decks, elevators, or armaments, to reduce costs. Together, the Sable and Wolverine were used to train 17,820 pilots (Wikipedia, United States Aircraft Carriers). Today, there are at least three actual aircraft carriers that have been de-commissioned and are in reserve, undergoing de-fueling, or on hold for donation. They are the Kitty Hawk, the John F. Kennedy (another John F. Kennedy carrier is under construction) and the Enterprise, and all are owned by the Navy. In addition, several others presently are residing at museums , but their condition is unknown, at least to me. If two of the three carriers listed above or other existing and available carriers, or other vessels, were to be appropriately outfitted and utilized for the limited purpose of creating a carrier-type facility strictly limited to FCLP operations, that arguably would resolve the necessity for OLFC and would resolve the attendant issues and problems accompanying continued use of OLFC that likely will continue to grow exponentially, if Alternative 1, 2, or 3 is selected by the Navy as the future for OLFC. Yet, the economic benefit of NAS Whidbey to the small city of Oak Harbor would continue unabated.

Further, commercial development of the OLFC facility would be a boon to the economy of Whidbey Island, same as in other areas where closure of military bases has resulted in commercial development around the former bases (google Mather AFB and McClellan AFB).

Moreover, those reclaimed, refurbished, or refitted carriers could move or be towed to temporary locations in safe environments on the East Coast and on the West Coast of the United States as needs arise. Mobility, in terms of moving a limited-use carrier to a climate that more likely matches the then existing “crisis” area, or that is geographically closer to such an area, would seem to be a far better scenario than the present system or projected system to do all FCLP’s at OLFC, save for 20 percent, maybe.

Capture, if you will, a momentary vision of one such carrier in the middle of the Bay Area of California, or off the coast of Santa Barbara, California, or San Diego, or Seattle, or the Puget Sound, and a day in which a hundred or so FCLP operations are executed. Would that be a tourist attraction? Would it possibly stimulate interest in Naval Aviation? Would it have beneficial PR attributes for the Navy? Would it be popular with civilians who live in the vicinity of OLFC? I think the answer to each of those questions is obvious. One final question: If it was good enough to do during a national crisis such as WWII, why could it not be good enough for today? I can't say what the cost would be, but as an alternative to a new OLFC landing strip to replace OLFC, the cost may well be a wise investment once consequences of living below Growler noise caused by FCLP operations become widely known and acknowledged by the courts.

2. OLF's on Indian Lands. One of the features of land in the Western part of the United States is the existence of Indian Reservations. There are many in both Oregon and Washington. Indian Tribes have the ability to control development or no-development on their lands, and in many respects exercise sovereign authority over the lands, including state-level taxation. In addition, many Tribes enter into construction contracts even to build airports. Constructing an OLF on Indian Lands theoretically could give the Navy contractual rights to build and use an OLF or two according to the terms negotiated in the contract. One term, in favor of an Indian Tribe, might well be a new school or some new housing 10 or so miles away from the OLF but still on the reservation. If certain lands on a reservation have no residents within even say a 40 dB DNL noise contour, maybe the Navy could make all the noise it wants and without hiring people to "man" complaint lines. Far fetched idea? I don't think so. It depends in part on location.

I point out that there are coastal reservations and there are reservations in the desert. Both seem to have comparative advantages.

It also depends upon the Navy reaching the reasonable conclusion that the "old" way of forcing its will upon a growing and unwilling public, as is the case in the communities surrounding the OLFC, and manipulating the data in a way that ultimately will come back to haunt the Navy, is over and done. New OLF's for both the "EA's" as well as the "F's" will become a reality. That can and should happen now, not next decade.

3. New OLF on Uninhabited Federal Lands. The Navy and the United States own thousands of acres of land in the Western states, including Washington, upon which multiple landing strips could be constructed and FCLP's could be practiced and performed with virtually no civilians beneath the flight paths, and future civilian development near flight paths of a new FCLP facility could be prohibited, as it should have been but is now too late for OLFC. Also, please note that the infrastructure required would not include many buildings. Indeed, at the Whidbey OLF, there are very few buildings other than the flight control approach radar, and a few other very basic-looking buildings. EA-18G's can be moved from one location to another very quickly. Indeed, low level flying training and some Electronic Warfare training for Growlers assigned to NAS Whidbey already is currently conducted in Eastern Washington and Oregon, where there are far more rodents than people or structures of people, including towns, hospitals, schools, and homes.

it should be noted that the cost of a single Growler is in the vicinity of \$100,000,000 dollars. The cost of constructing a new and ideal FCLP landing strip or two on Government Lands could and should be less than that cost for one Growler, and likely would be in an area with no civilians

living below the flight paths. It is clearly too late for that ideal landing strip to be OLFC unless the Navy condemned and purchased all homes on Whidbey Island below the flight paths, or within the noise contours as drawn and shown in the DEIS.

4. NEW FCLP-Only Landing Strips. The Navy could add two additional landing strips at NAS Whidbey, on Navy-owned lands, and by way of eminent domain, and could buy or “take” through eminent domain the relatively few privately owned homes that may be situated beneath new FCLP flight paths. Noise issues are lessened by distance and a suitable distance could be prescribed in new flight path tracks that would tend to minimize noise-related issues. Further, those flight tracks could be designed so that the vast majority of the flight paths would occur over water.

5. Buying Land on an Uninhabited Island in the Pacific Northwest. The Navy could be compelled to reject their absurd judgment that it is fair and reasonable, and not a gross abuse of power, to subject one inhabited island in America to the horrific, indeed sometimes terrifying, noise generated by their EA-18G’s. To increase from 6,100 to 35,100 the number of FCLP operations proposed to be forced upon the civilians living near OLFC and the community of Coupeville likely could be determined to be an unconstitutional abuse of power and a denial of procedural and substantive due process required by the United States Constitution. The cavalier attitude of the Navy reflected by the DEIS could become the cornerstone of a legal effort making those allegations. Finding another location for OLF’s is a reasonable solution.

Increasing the number of FCLP’s performed at OLFC in the manner proposed in the DEIS would not only subject residents who live beneath the Flight Tracks to unimagined health risks, auditory and non-auditory alike, and would devastate wealth of many Americans who already have put in their time as loyal American citizens and have worked all their productive lives. That includes me. My home, completed in 2002, is valued at over \$2,000,000, based upon the USAA Insurance Replacement Appraisal, the waterfront Lot value as assessed by the county, and the Garden and View.

The Independent study of the situation at Luke AFB, regarding the F-35’s, is instructive and frightening, to me. Pertinent are the following portions I have quoted:

“The development potential of approximately 33,000 acres in the West Valley communities surrounding Luke AFB has been constrained by these [government regulations] (Luke Forward Campaign 2009). Some incompatible development occurred before these restrictions took effect. . . .”

“The Impact of Aircraft Noise on Property Values. The negative effect of airport/aircraft noise on property values is a well-researched/documented issue. There are dozens of published studies on the topic, all of which come to the conclusion that property under or nearby the flight corridors of airports experiences diminution in market value.”

“One of the most important studies was conducted for the Federal Aviation Administration in 1994. The results indicated a consistent negative impact of aircraft noise on residential property values. For the area surrounding the Los Angeles International Airport (LAX), in the case of moderately-priced homes, it found a 1.1 percent loss in market values per dBA above a “quiet threshold.” For the John F. Kennedy Airport (JFK) in New York, the loss in market value for moderately-priced homes was estimated at 0.5 percent per dBA. (Bell 2001).

Studies of the environs of LAX, Ontario, and John Wayne airports in southern California estimated the negative impact of values of single-family residences ranging from 15 to 43 percent – averaging a 27 percent loss in market value. The studies also included analysis of the impact on non-residential property and found significant negative effects on commercial space.

A 2004 study that synthesized the results from 33 studies of airports in Canada and the United States over the 1969-1997 period estimated a range for the loss in residential property values of 0.5 to 0.7 percent per dB for levels up to 75 dB. The study indicated that the noise discount would be substantially higher for areas that are affected by noise levels higher than 75 dB (Nelson 2004). These statistics imply that the value of a moderately-priced home located within the 65 DNL noise contour would be about 9 percent lower than an equivalent home located in a neighborhood not affected by aircraft noise."

"The analyses of the Southern California airports found more severe effects of aircraft noise on property values. The 1.1 percent loss in value per dB estimate from the LAX study would imply that the loss in value of a home within the 65 DNL contour would be almost twice as large at about 17 percent."

"Negative Economic Effects of Existing Noise Levels
Impact on Property Values"

"A substantial portion of land zoned for residential use in El Mirage, and some areas zoned for residential use in Surprise and Buckeye are located within the JLUS 65 DNL. The values of existing homes in these areas are substantially lower than they would otherwise because of their location in the vicinity of Luke AFB and subject to high levels of aircraft noise. Based upon the results of the studies cited above, estimates of the magnitude of lost value would range from 9 – 17 percent. In dollar terms, this would mean that the value of a home located within the 65 DNL noise contour otherwise valued at \$150,000 would be worth \$14,000 to \$26,000 less than an equivalent home without aircraft noise."

"Negative Economic Effects of the F-35's Higher Noise Levels
Impacts on Property Values"

"Evidence from testing indicates that the noise levels associated with the F-35 compared with the F-16 are anywhere from about 10 to 20+ dB higher. Using the lower bound of an increase of 10 dB would imply a loss in value in the 6 - 11 percent range for homes in the areas affected by the higher noise levels, while a 20 dB increase would imply losses in value in the 12 - 22 percent range. Losses of these magnitudes would be equivalent to dollar losses of \$9,000 to \$33,000 for a \$150,000 home."

"Because of the higher noise levels associated with the F-35, the area significantly impacted by aircraft noise will be much larger than was the case with the F-16, and more residential areas with many more homes will be affected. As described in the previous section, virtually all of El Mirage, Youngtown and substantial areas in Sun City, Surprise, Litchfield Park, Goodyear, Buckeye, and unincorporated Maricopa County will become subject to aircraft noise levels high enough to affect property values."

"Thus, the higher noise levels would result in declines in the market value of residential properties of hundreds of millions of dollars in these West Valley communities. The case of El Mirage offers the clearest example, since virtually all of its residential areas would be covered by the F-35's 65 DNL noise contour. Residential property owners in that city alone could suffer overall losses in the \$200 million range, based on the mid-point of the percentage losses in market values cited above." (archive.azcentral.com/ic/community/pdf/luke_air_force_base-noise-study-0414pdf), An Evaluation of the Potential Loss in West Valley Home Values from Locating F-35 at Luke Air Force Base, Timothy D. Hogan, Ph.D.).

An "Evaluation" of the consequences upon property values at OLFCA would seem to be in order, if the Navy seriously thinks the best thing to do in view of the Navy's short-sighted planning (at least the publicly disclosed portion of Navy planning) is to burden all families who live in Coupeville and its environs by imposing an intolerable level of FCLP noise upon civilians who have no economic benefit coming from the Navy See Sec. 3 Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy; and Sec 4, DEIS' Economic Benefits to Coupeville and its Environs Means Negative Impact Burdens, My Comments).

Navy expectations that it is ok to subject living Americans to the extreme Noise-Terror that would accompany living below flight tracks of Growlers executing FCLP's increased from present levels by up to 575 percent is beyond realism. There are too many reasonable people in Washington and in Washington D. C. to permit that to continue for the next 40 years, the expected life of an EA18-G. It is time for some conscience to reign in the Navy. It is not clear that the Navy has one.

I will make this offer to Growler Pilots and their EA Crewmate. You are welcome to spend an afternoon at my home, on a busy FCLP day at OLFC. You may spend the afternoon in my garden, and enjoy the view and the beauty; and try to enjoy it at the same time Growlers are performing; and my wife will be as gracious as any host you ever have encountered. You don't need to bring hearing protection. The Navy hasn't issued a warning for any hearing or other health dangers.

Message to the Navy: I don't believe anyone will show up, or stay if they do show up on a busy FCLP day.

SECTION 7

DEIS BIAS: BENEFITS FROM NAS WHIDBEY

The DEIS, at Section 4.2.5. states that “The most appropriate means of differentiating between the impacts caused by the different alternatives and scenarios is by comparing the total estimated population within the DNL noise contours between the alternatives.” While it is true that it is a way of differentiation, that conclusion that it is the “most appropriate” is belied even by just a little bit of honest analysis that cause that “most appropriate” claim to become superficial and inherently biased. It neither recognizes the basic, fundamental differences between two reasonable and decent cities. Their histories and present economic structures could not be more stark nor different (see Section 3, Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy?; and see Section 4, DEIS' Economic Benefits to Coupeville & Environs Means Negative Impact Burdens, My Comments). Coupeville's right to continue to exist as it has since 1851 (it is the second oldest town or city in Washington) is required by NEPA to be protected, not destroyed. Perhaps, it is merely reflective of a view that entails an Admiral up the ranks from NAS Whidbey, who already has made up his mind, and demands those below him/her support this conclusory statement as a way to implement his/her favorite proposal. Further, it is clear that actions by the federal government, which the Navy obviously is a part of, is subject to the limitations expressed in the United States Constitution. It is a fundamental right, under our Constitution, that actions of the federal government that affect and essentially classify citizens of Coupeville and its Environs in a discriminatory manner will be held to violate the Due Process Clause of the Fifth Amendment to the United States Constitution. A decision based upon the assumption that it is “most appropriate” to stick-it-to Coupeville and its Environs because there are fewer residents there than at NAS Whidbey and Oak Harbor, in my opinion, would be determined by a Federal Court to be an action made in violation of the Fifth Amendment.

That highly offensive and inaccurate statement, contained in the DEIS, is nothing more than a conclusion unsupported either by evidence, data, or rational argument. It is devoid of value as a defensible decision. One major basis of differentiation, that is not reflected in the DEIS, is as to the relative level or type of interaction between the Navy and the area around NAS Whidbey, compared to the interaction between the Navy and Coupeville and its Environs. If you consider that the NAS Whidbey Complex in Oak Harbor includes approximately 7,090 military personnel and their families, and employs about 2500 civilians, most of which have families, and houses vastly more of both groups, it follows that there is a strong, interdependent interrelationship between the Navy and Oak Harbor. Further, for the past decade (I didn't check back beyond that), fully 50% of the students in Oak Harbor Public Schools have parents who are stationed at NAS Whidbey, or who otherwise work at NAS Whidbey. Those two groups of people support and “feed” many of the private businesses that provide amenities and services in Oak Harbor. Even in the town of Anacortes, which is not even in Island County (both Oak Harbor, Ault Field, Coupeville, and the OLF are in Island County), the figure for students in the Anacortes Public Schools from those two categories of “Navy-related people” exceeds 10 %. In Coupeville, it is less than 10 %, and has been declining. Military personnel by and large choose not to live in Coupeville. Coupeville is not a Navy town. Oak Harbor is a Navy town. The obvious and primary source of employment among Oak Harbor residents is NAS Whidbey. The economic value or benefit of the Navy to Oak Harbor is huge. In Coupeville, the economy, town's ambiance, and attractions are not Navy-based. It is Tourist based. It is small-agriculture-based.

It is locally-owned restaurants-based. It is locally-owned shops-based. The two towns are hugely different. I'm not saying that one is superior to the other. Some people even like both. For me, I am a Coupevillian by choice of lifestyle. Coupeville is a great town for retirement people. I am far more comfortable in Coupeville. I even obey the slow speed limits. But the Navy is seeking to destroy all of that apparently without even considering the possibility of the adverse impacts of its proposals. The DEIS also avoids any analysis of the unique nature of the economy of Coupeville, or its attractions to so many Tourists who definitely won't want to come to Coupeville and be forced to listen to Growler noise of near or well over 120 decibels per FCLP flight tracts that are several miles wide and about 4 times as long, flying as loud as a tornado. 36,100 times per year. Round after round the flight track. Except Coupeville could get its economy knocked out before too many rounds. But that wouldn't stop the Navy.

In any event, contrasted with Oak Harbor, where there is major economic dependence upon NAS Whidbey, Coupeville derives scant value or benefit from the Navy. Thus, to say that population is the best way to compare the impact of the proposals is to compare population is preposterous. Indeed, it is to compare apples to dirt. It also would be a way to impose the largest noise burden (it absolutely is not a benefit) of the proposals, represented by Scenario A or Scenario B of each of Alternatives 1, 2, or 3, upon the smallest community and the only one of the two communities that is opposed to all Scenarios in all three of the numbered proposals. The Mayor of Oak Harbor just announced publicly a barn storming trip of city officials to Washington D.C. to lobby in favor of more Growlers for NAS Whidbey. For Oak Harbor, that means more jobs. You won't find city officials from Coupeville joining the Oak Harbor delegation. Coupeville is quoted in the Oak Harbor newspaper as opposing any more Growlers at OLFC. Oak Harbor would gladly accept more Growlers, but of course, the fly in the pie is that Ault Field cannot handle the additional FCLP operations, so the Navy, with their short-sighted planning, is willing to accept all the Growlers owned by the Navy to be Ault Field-based, but wants to increase the number of FCLP's at OLFC from the current 6,100 FCLP's (an already intolerable and dangerous level, up to an obscene 35,100 FCLP's.

Most of the Citizens who live near OLFC and in Coupeville absolutely do not want that to impact their lives and their wealth. It will damage our hearing health, and would result in higher risks in other, vital areas of health, notwithstanding Navy assurances to the contrary. Those "assurances" do not withstand close scrutiny and are ill-advised and inaccurate. There are numerous studies that reach conclusions contrary to the Navy's assurances. Further, the Navy's decision regarding OLFC likely will seriously degrade and depress our home values more than now. It would be a disaster. The Navy clearly needs to find another OLF location that will not torture Civilians with their unwanted noise. Think of it - the Navy is projecting to increase FCLP operations at OLFC from 6,100 FCLP's per year up to 35,100 per year. That would be tantamount to the Navy Declaring a Noise War against the Civilians who primarily live near OLFC, as well as Economic War against Coupeville. We deserve more consideration, consistent with limitations upon the Federal Government and the United States Navy by the Federal Constitution and Federal Laws.

The DEIS contains a Table indicating both the estimated geographic acres and the estimated population that resides within the contour ranges of 65-70 dB DNL, 70 to 75 dB DNL, and higher than 75 dB DNL, and makes the contradistinction between the acreage and population of Ault Field and OLFC. This is another reason why the DEIS is either purposely slanting the data to support the obvious preference of the Navy for a 20%-80% split of FCLP's for Ault Field getting 20% and OLFC getting 80%. The contour lines throughout the DEIS are drawn for Ault Field and for OLFC using two different methods. For Ault Field there are lobes drawn from the end of each Runway extending out as far as 10 miles from the "Runway endpoints. The extra length of

the lobes on the contours is said to be “primarily due to the Growler on the GCA patterns [ground controlled landing approach] where the aircraft generally descends on a 3-degree glide slope through the 3,000 feet level” 10 miles from the runway. Similar lines are not included for the OLFC contours, notwithstanding that hundreds of Growler flights are executed in a direction that includes flying directly over OLFC that represent flights from Ault Field (at a 300-450 knot speed (my observation) preliminary to entering the closed-loop FCLP tracks at OLFC, or that represent flights exiting FCLP closed-loop patterns at OLFC and departing from OLFC (like directly over my home) and ascending to one of all sorts of levels and invariably at a much higher speed than the speed of a closed loop, some of which may even include Growlers utilizing afterburners. These flights, typically, would be return trips to Ault Field for fuel, food, or rest between sessions. If there are 5 Growlers involved in FCLP operations and flying in the same session, each would execute some number of closed loops flights involving a Touch and a Go on each loop (unless a “touch” is waived off because of one or more of several factors involving positioning, wind, speed, altitude etc.). The point, however, is that each Growler will have an arrival to and a departure from OLFC for each session. Those flights are over land that are not reflected in the contours drawn for OLFC. Typically, an 8 - 10 hour FCLP schedule may include 4 or 5 sessions. Doing the math will show that for one flying day at OLFC involving five Growlers and five sessions, there will be 25 arrivals and 25 departures that are not reflected on any Contours for OLFC, but are reflected on the Contours for Ault Field. This is but one example of many that tend to show that the DEIS, indeed each DEIS that I have looked at since 2005, understates the predictable noise at OLFC compared to Ault Field. That is only one reason why the DEIS should be rejected as a serious or fair description or prediction of noise preferred to be foisted unilaterally upon the communities surrounding OLFC.

Moreover, Table 3.1-3, entitled Annual Modeled Affected Environment Operations At Ault Field and OLF[C]” is more evidence of the slanted bias of the DEIS in favor of unilaterally imposing noise upon the the unwilling communities surrounding OLFC. That Table is attached for your convenience at the end of this Section. Notice that for Ault Field, under presently existing experiences, the number of FCLP’s performed at Ault Field is 14,700 and for OLFC is 6,100. Then, if you look at the numbers for “Other Operations” the number for Growlers at Ault Field is 53,100 and for OLFC is a big fat zero. Is that an accurate depiction of facts, or are those “alternative facts”? The DEIS contains in Section 3.1.2 a discussion of why a different metric should not be used in describing the extent of operations at Ault Field and at OLFC, but does not defend the exclusion from the OLFC Contours the full measure of noise emanating from flights over OLFC at relatively low altitudes when both are in a high noise, powered mode of flight that are departures from or arrivals at Ault Field. To my way of thinking, noise is noise wherever it originates. The DEIS considers, for contour drawing purposes, noise generated by Growlers arriving at Ault Field that departed a NAS other than Ault Field, and considers noise generated by flights departing Ault Field but doesn’t consider noise at OLFC as including noise that is generated by Growlers that fly directly over the OLFC on an arrival at or departure from Ault Field not involving FCLP operations.. As a result, the flight operations stated in Table 3.1-3 are an inaccurate comparison of flights that generate noise in the Contours drawn and presented in the DEIS. That is merely another of the many negative biases contained in and reflected by the DEIS, which speaks for the Navy at NAS Whidbey, not for OLFC. Footnote 3, accompanying Table 3.1-3, is interesting and it may be seen on page 3-14 of Volume 1 of the DEIS, and reads as follows:

“3 The term “Other Operations” includes Touches-and-Goes, Depart and Re-enter, Ground Controlled Approaches, and Carrier Controlled Approaches. . . .”

Maybe that statement should be revised to say that Touches and Goes are included/counted for both Ault Field and for OLFC, but all other overflights and arrivals and departures at or from

OLFC are not included for OLFC, but are, of course, included in the “facts” attendant to the drawing of Contours for Ault Field. Thus, that language supports the view that the contours show more people would be impacted in Oak Harbor than in Coupeville. The degree is the issue. In the DEIS, the degree is affected directly but not fairly, in my opinion.

Figure 3.1-3 is entitled Aircraft Arrival and Departure Flight Tracks at NAS Whidbey Island Complex and shows about 10 separate arrival flight tracks for aircraft, including Growlers, arriving at Ault Field on flights not involving FCLP operations at OLFC. Those are among the flights that are considered in the DEIS in the drawing of Contours for Ault Field and tabulated for multiple purposes including establishing DNL figures, but not considered for any purpose in tabulating figures or drawing Contours for OLFC. Nonetheless, those flight arrivals in fact generate a high level of noise in the vicinity of OLFC. I can say that firmly, accurately, and honestly by virtue of having lived in the same home near OLFC since 2003. On Figure 3.1-3, the “departure” flight tracks are depicted in pink and none of the lines in pink are indicated to fly directly over the vicinity of OLFC. My experience in the past 13 years leads me to say firmly, accurately, and honestly that there are many more days in the year in which departure flights from Ault Field fly directly over my home and OLFC than there are flying days in any of those 13 years. Moreover, many of the flights have a noise profile having a very high intensive noise level and a sound duration period of time at least three or more times as long as the duration of a noise profile for any single Growler executing a FCLP. Further, the noise on both departure and arrival flight tracks often is magnified and accentuated because of variables such as multiple Growlers in a group formation, the ascent is with full power, or the arrival flight is descending from a very high speed and high altitude, thereby accentuating the noise emanating from the Growler or Growlers in flight at the time; and often involves multiple aircraft.

Similarly, Table 4.2-1 shows the estimated acreage and population within the “DNL Contour Ranges” for both Ault Field and OLFC and other tables are included elsewhere for each of the Alternative proposals.

Historically, there seems to me to be an underlying Navy bias in favor of increasing the number of FCLP’s more for OLFC than for Ault Field. The DEIS, as I have shown, is structured in a way that supports that conclusion, but it isn’t limited to the DEIS. For example, there is a document bearing the signature of the then Base Commander of the NAS Whidbey Complex, [REDACTED] and signed under Penalty of Perjury. The document is a Declaration in support of the Navy’s opposition to a Plaintiff’s request for an Injunction: That Declaration in part states: “The population surrounding Ault Field is greater than that surrounding OLF Coupeville which means noise impacts from aircraft operations at Ault Field impact a greater number of people than at Coupeville.” a footnote, numbered 2, states as follows: “Population data shows that in 2010 Coupeville, Washington, population was 1831 and Oak Harbor population was 22,075.” While those numbers are accurately quoted, they are misleading and deceptive and, in my opinion, reflects the existing and continuing Navy bias to which I refer and which I believe is real. It is simply a superficial, conclusory position devoid of merit as a basis upon which to reach a conclusion.

OLFC is NOT within the city limits of Coupeville, and OLFC encompasses far more people than the population within the city limits of Coupeville. Also, I point out that the data to which [REDACTED] referred includes statistics for all of Island County, in which both Coupeville and Oak Harbor are located. The population for the entire county is said to be 78,506, of which 28,438 is located outside the city limits of those two towns as well as all other towns in Island County. Indeed, 100 percent of the population surrounding OLFC resides outside of the city limits of Coupeville. While I do not ascribe “Perjury” to the actions of [REDACTED] I suspect

he or his staff had a motive hidden by his choice of words. Or maybe it was just sloppiness and incomplete research or incomplete thoughts by his staff. Worse, however, is that [REDACTED] seems to have been very comfortable with making a statement belittling the communities surrounding OLFC as being more “worthy” of more noise than the community of Oak Harbor because Oak Harbor has more population. He doesn't bother to point out that the economy of Oak Harbor is directly dependent upon NAS Whidbey or that the economy of Coupeville is dependent to a large extent upon Tourism and small-farm agriculture, as well as being the county seat. Tourism and FCLP's are like oil and water. They don't mix. Tourists come to Whidbey Island often to “escape” from the business of their lives elsewhere. Coupeville is laid back, not hustle/bustle, and definitely not captured by what could be [REDACTED] mantra assumed to be “More Noise For Coupeville Because They Have Fewer People Than Oak Harbor.”

Consider the relative benefits to the respective communities of Oak Harbor and Coupeville, of being located close to NAS Whidbey or to OLFC. Oak Harbor derives a very large economic benefit from NAS Whidbey, in the context of real estate values in the price ranges that are popular with Navy personnel and residents that obtain employment directly or indirectly from the Navy. What would happen to the economy of Oak Harbor if NAS Whidbey was closed? At least for a few years, the Oak Harbor economy would collapse or be in an economically depressed state. Not so much for Coupeville. There might be a little downturn, but its shops and restaurants derive more business from Tourists and Whidbey Islanders who live close to Coupeville, and likely would survive. It would be quieter and more conducive to more Tourists seeking quiet, solitude, peaceful surroundings in which to relax.

Further, I believe it is accurate to say that even the lovely community that is Anacortes, which is located in Skagit County, unlike either Oak Harbor or Coupeville, receives a larger overall benefit from NAS Whidbey than Coupeville. It is the case that noise associated with Ault Field is acceptable to a far greater percentage of the resident population in Oak Harbor than it is by Coupeville, and jobs, jobs, jobs, is the driving reason why that is so. In that regard, a Department of Defense document, (See militaryinstallations.dod.military) states that in the context of NAS Whidbey, there are 7,050 military personnel and 14000 dependents, 2,400 civilians jobs and contract employees and about 5,000 family members, plus even 50 Canadian members of the Canadian military and their families. Those numbers are projected to increase significantly in the relatively near future. Thus, there are more people dependent upon employment or military service at NAS Whidbey than the entire population of Oak Harbor, but the Oak harbor population likely does not include persons residing on-base or in Navy housing.

In contrast, there is a paucity of interaction between the Navy and the people who live in the neighborhoods surrounding OLFC. If you consider the lack of interaction and the virtual absence of economic benefit to the OLFC neighborhoods, there is a huge difference between a comparison of Oak Harbor and Coupeville, in the context of who merits more FCLP operations. Moreover, there are numerous topographical maps in the DEIS showing runways for both OFLC and Ault Field. I invite you to take a close look at two maps for the purpose of comparing density of houses within one mile of the Runways. For Ault Field, Runways 14 and 07 appear to have no houses between the end of the runways and the ocean, Runway 25 has few houses between the end of the Runway and on into Dugualla Bay. Runway 32, which is seldom used for FCLP's does have several houses before reaching water either at Dugualla Bay or beyond the Seaplane Base, which is part of the NAS Whidbey complex. In comparison, Runway 32 at OLFC, since the arrival of Growlers, has been used far more than Runway 14 for FCLP powered-landing approaches preliminary to the “Touch” portion of a FCLP and also receives considerable noise from the “Go” portion of a FCLP when Runway 14 is used. Topographical

maps show dozens of homes at the end of the "clear" zone of Runway 32. That comparison draws into serious question the accuracy and validity of of [REDACTED] comment to the effect that FCLP's impact a lot more people at Ault Field than at OLFC, if you consider the number of people who are exposed to 75 DNL or more. Moreover, [REDACTED] claim doesn't address at all the economic impact upon Coupeville and its environs of even the No Action Proposal, much less Alternative 1, 2, or 3 in each of the three scenarios proposed as possibilities in the DEIS. But that seems to be the standard of analysis replete throughout the DEIS.

This discussion leads to the final point that, in view of the fact that the Navy is moving to Ault Field ALL of the Growlers owned by the United States to NAS Whidbey to become their home base for all training and FCLP's, that would be a decision that could not withstand close scrutiny, in terms of the uncompensated burden it would impose upon the Civilians who happen to live near OLFC and who have scant connection or interaction with NAS Whidbey. Those citizens are not the enemy of the United States Navy and should be protected from having their lives and property wealth destroyed by an overly aggressive and short-sighted, and apparently uncaring Navy. Indeed a Navy that apparently is led by men willing to engage in unconscionable, un-American behavior, as by subjecting Civilians to the noise that comes with Growlers. it is absolutely time to close OLFC and find another location or alternative to imposing upon the residents of the neighborhoods surrounding both FCLP landing strip the ever increasing burdens of noise, that are not offset by benefits, upon thousands of unwilling recipients of dangerous levels of noise. The extent of the noise dosages are not provided in the DEIS. You, the reader, should ask why not? Because of noise levels, hearing health issues, and other health issues, not to mention the risks to the economic health of Coupeville and its environs, maybe now is the time to demand a serious inquiry at the local level, by the highest levels of Navy Command, and by the appropriate committees of the United States Congress. Maybe it's time to tell the Navy that now is the time to find a permanent solution to its FCLP landing strip by finding a location that avoid all issues respecting civilians living beneath FCLP flight tracks. It's time to stop imposing high and dangerous levels of noise unilaterally upon civilians having scant connection or interaction with the Navy to bear the noise burden resulting from the Navy's poor decisions of the past.

SECTION 8.

DNL, NIOSH, & OSHA: On Noise Exposure Doses

DNL is not an actual measurement of noise, but rather a 24-hour, day/night average. Thus, the entire 24-hour period of time is used. Why it is important to use both noisy time and sleeping or quiet time is an interesting question. The answer is that is just the way it is done. That 24-hour average could include data from one day, one average flying day, one week, one year, or any other period of time. Considering that the Navy claims it conducts FCLP operations at OLFC only approximately 45 days per year, you might think that the 24-hour day/night average reflecting Growler noise on those 45 FCLP-flying days might be the appropriate time period to reflect sound averages on those days. Not so much. The Navy's average is for the entire year. It includes every day of the year. The result is a much-diluted number, expressed in decibel levels that don't really exist, and then to draw contour lines for various levels of "DNL" numbers. Historically, there have been studies to determine for example the threshold expressed in the DNL's, at which complaints about noise levels have started or that reflect percentages of people who are "highly annoyed." That category of people has been reflected in the history of the development of airports as well as land-use planning.

My favorite quote about "DNL" is contained in a document advocating the "Abandon[ment of the Current Day-Night Level Noise Standard of 65 dBA DNL," from the website of the NPC-Noise Pollution Clearinghouse and it is:

"A punch from Michael Tyson, averaged over an hour, is equivalent to a love pat." The averaging hides the impact. It would be further diluted if averaged for an entire 24-hour period.

One indicator of the appropriateness of using primarily the DNL 24-hour Day-Night average to determine the risk to Civilians who live private lives in homes near the OLFC is to compare the use of that standard with the manner in which the Navy collects and assesses noise in other settings. Search results from "Googling" combinations of words such as Navy, noise, exposure, Navy Medicine, and high noise sources, for example, reveals the existence of a large number of reports, studies, surveys, charts and other documents, many within the past 10 years, that clearly signals the existence of serious Navy concerns about high-levels of noise, including disability costs in the context of Navy personnel and civilian employees. But nothing about consequences of living in a home in a neighborhood inundated with noise from FCLP's. A review of those documents yields one striking result. In that body of research and analysis, it is difficult to find even one that relies primarily on the DNL standard of noise exposure, in contradistinction to the DEIS.

DNL standards comprise the primary tool of analysis in the DEIS and may facilitate a finding and decision of "No Significant Impact" for any of the proposals contained therein. In other situations, like cockpits, flight decks of aircraft carriers, engine rooms, and numerous other areas where people work, the noise metric of DNL generally is not mentioned. Instead, actual numbers, expressed in dB's or averages or time-weighted averages are collected and then assessed. In one Navy document regarding noise, the document declares that "this chapter provides the basic information necessary to evaluate and document employee noise exposure and to assist with determining compliance with Department of Defense (DoD) noise instructions

(www.Med.Navy.Mil/sites/mmcphc/Documents/industrial-hygiene/HFOM-Ch.5.pdf. In another, the Defense Safety Oversight Council Initiative contains numerous charts, including one entitled "Nine DoD High Noise Sources and One Promising Technology, which references the length of unprotected exposure time in various work environments encountered within the Navy workplaces, all of which, except one, are lengths of time less than a full minute for exposure to levels of noise expressed in decibels (dBA)(www.public.Navy.Mil/NAVSEFECGN/Documents).

My point essentially is that the DEIS does not concern itself, or express Navy concern for noise exposure for any category of Civilians who will be exposed to noise levels that, if it were a Navy workplace, the Navy would encounter legal obligations, if the noise exposure measured in decibels and in duration meets certain threshold levels, to provide hearing protection devices suitable for the working environment, warnings about exposure in terms of exposure time limitations, and restrictions on duration of exposure. Notwithstanding that the DEIS is threatening to increase FCLP's from 6,100 to 35,100 at OLFC per year, but is not providing the noise exposure projections based on a suitable metric that is not DNL for all the FCLP anticipated to be executed in a day, a busy day or a month, or whatever. That statistic is useless if expressed in a way that dilutes actual measurement with the noise exposure while sleeping.

Next, I wish to refer to a document entitled Noise Exposure: Explanation of OSHA and NIOSH Safe-Exposure Limits and the Importance of Noise Dosimetry, prepared by Patricia T Johnson, AuD, of Etymotic Rsearch, Inc. The document states, as follows:

"It's a noisy world, and hearing damage from loud sound affects millions of people. Noise-induced hearing loss (NIHL) and associated disorders of tinnitus, hyperacusis and diplacusis are all irreversible. This is a tragedy, considering that these often debilitating conditions are preventable. The keys to prevention are in understanding the risks and consistently acting to minimize the risks." I have attached to this Section of my Comments, a copy of the Johnson article. It is well-written and easily understood. I think.

Dr. Johnson presents the case that there is new evidence confirming the existence of a greater need for monitoring in view of new research that concludes "that noise can produce subclinical damage that goes undetected, progresses unnoticed, and really manifests itself long after the fact. We can't measure this subclinical damage using audiometric tests, including the "gold standard" for testing NIHL: pure tone hearing thresholds. Data collected over many years from persons exposed to industrial noise shows that most NIHL develops over the first 10-15 years of noise exposure and then asymptotes (levels off). From a preventive standpoint, the sooner we identify hearing risk and minimize it, the better. We need to educate our young people and equip them to protect their hearing at an early age, ideally before damage occurs. To do this we must monitor noise exposures to assess risk and use hearing protection when necessary to reduce the risk of NIHL."

In the United States, the Occupational Safety and Health Act of 1970 created two organizations, OSHA (Occupational Safety and Health Administration in the U.S. Department of Labor); and NIOSH (the National Institute for Occupational Safety and Health in the Center of Disease Control and Preventions in the U.S. Department of Health and Human Services. OSHA develops and enforces workplace safety and health regulations, while NIOSH conducts research and provides information, education, training, and recommendations regarding occupational safety and health. NIOSH recommends standards and best practices, but does not have regulatory or enforcement authority.

The following chart contains duration of allowable exposures of OSHA and NIOSH:

Level, in dB A	85	88	90	92	94	95	100	105	110	115
OSHA PEL	16		8			4	2	1	0.5	0.25
NIOSH REL	8	4			1		0.25			

“Duration (in hours) of allowable exposures based on OSHA and NIOSH criteria. PEL = Permissible Exposure Limit; REL = Recommended Exposure Limit. Noise exposure levels/times exceeding those shown in Figure 1 require the use of hearing protection.”

“OSHA permits exposures of 85 dBA for 16 hours per day, and uses a 5-dB time-intensity tradeoff: for every 5 dB increase in noise level, the allowable exposure time is reduced by half. For every 5 dB decrease in noise level, the allowable exposure time is doubled. All time/intensity values shown on the OSHA PEL line in Figure 1 are assumed to have equal risk to each other, that is, 16 hours at 85 dB carries the same auditory risk as 8 hours at 90 dB, 4 hours at 95 dB, 2 hours at 100 dB, and so on.”

“NIOSH recommends an exposure limit of 85 dBA for 8 hours per day, and uses a 3 dB time-intensity tradeoff: for every 3 dB increase in noise level, the allowable exposure time is reduced by half. For every 3 dB decrease in noise level, the allowable exposure time is doubled. The time/intensity values shown on the NIOSH REL line in Figure 1 are assumed to have equal risk to each other, that is, 8 hours at 85 dB carries the same auditory risk as 4 hours at 88 dB, 2 hours at 91 dB, and so on. “

“The differences in OSHA criteria and NIOSH recommendations for exposure limits produce different outcomes: the more lenient OSHA values allow for higher exposures for longer durations and the more conservative NIOSH values recommend lower exposures for shorter durations.”

The following chart presents a graphic comparison between the NIOSH and OSHA exposure limits. NIHL means noise-induced hearing loss:

The Johnson Article also contains a discussion regarding monitoring sound exposure by the use of either sound meters or sound dosimeters. In addition, there are new developments in the form of I-Phone and Android applications (that are very inexpensive) and the reading information suggests that the combination of a highly-rated "app", combined with an omni-directional microphone mounted on a stand, will provide you with an ability to measure your own sound exposure. Personally, I certainly will do so, because I do not believe, given the extraordinary amount of money expended by the Veterans' Administration for military-related hearing disabilities, that for some residences around OLFC it will take 40 years, as the Navy claims, for hearing damages to be manifested by loss of hearing. Indeed, I have lived in the same home for the last 14 years and believe that my hearing has sustained a measurable and significant loss of hearing capability. Further, I am bothered with having received no warnings that I should have been wearing protective ear coverings. I admit that I did not do so, but did not believe I was in any danger or I would have been told. Indeed, I doubt that even as to the people the Navy paid \$750,000 to, for Avigation Easements approximately 14 years ago, the Navy provided any warnings. Given the vast experience the Navy has accumulated in regard to hearing disabilities, I cannot understand the current position of the Navy regarding Civilians who live beneath FCLP flight tracks and some of us have worked 1,000's of hours in our respective backyards and gardens.

But I do believe it is up to us Civilians, at present, to both measure the actual sound level exposures in our respective yards, and to occasionally have a witness observe and take notes just in case. . . . Further, we all should wear protective ear coverings. when FCLPs are so close it hurts or is uncomfortable.

Last but not least, the Johnson article discusses the topic of "Noise Dose," and explains not only the differences in the OSHA and NIOSH standards, and indicates that the differences are most pronounced at the highest noise levels, as you can see in the charts above. She makes the point that the risk of noise-induced hearing loss is greater under the OSHA standards than under the NIOSH standards. The Navy follows the OSHA standards. My personal view is that because the NIOSH standards were adopted in 1998, after many additional studies had been conducted following adoption of lower standards by OSHA in 1983, the NIOSH standards are the standards Civilians living the noise hell that may be unilaterally imposed upon us should follow for a self- monitoring program in lieu of one that the Navy won't provide. The clincher is that the Johnson article on page 7 warns that a single exposure of 100 dB for 2 hours, which is acceptable under OSHA standards but not acceptable under NIOSH standards, resulted in "irreparable damage to IHC afferent nerve terminals and associated degeneration of the cochlear nerve." The inference is that there is little if any room for individual differences (age,

prior non-military noise exposure, and so on) under the OSHA standards and that it may well be wiser to follow the NIOSH standards.

Keep in mind that there are places near OLFC where even the Navy's projections (which are said by a private study to be inaccurate by being too low) show maximum sound exposure levels at 3 of the 4 residential POI's for OLFC with levels well over 100dB and remember that for ever 3 dB there is a noise doubling effect. Using the Navy's numbers, how many times would a Growler come over the Admirals Drive POI on an up-tempo, 5-Growler, 5-Session flying day. What would be noise exposure be if you are planting summer plants in your backyard all day long? What if the Navy's projections are wrong by 6 decibels on the low side.?

The Johnson article continues with this statement about noise dosage:

"An important point about noise dose is that it is cumulative; noise dose never decreases over time. While sound levels may go up and down over time, noise dose only increases or plateaus over time. This is because you can't remove the exposure once it has occurred, much the same way you can't undo sun exposure after the fact. When the combination of sound levels and duration exceed those shown in Figure 4, noise dose increases to values greater than 100% (see Figure 5)."

Figure 5

OSHA (1983)			NIOSH (1998)		
<i>Level (dBA)</i>	<i>Duration</i>	<i>Dose %</i>	<i>Level (dBA)</i>	<i>Duration</i>	<i>Dose%</i>
105	1	100	94	1	100
105	2	200	94	2	200
105	4	400	94	4	400
105	8	800	94	8	800
105	16	1600	94	16	1600

"A 200% noise dose is two times the allowable limit (equivalent to two days' worth of noise exposure); a 400% noise dose is four times the allowable limit (equivalent to four days' worth of noise exposure), and so on. Do exposures like this occur often enough for us to be concerned? Absolutely! Measurements taken during a drum line demonstration in the band room at a local high school, with only half of the drum line students resulted in a 1400% noise dose after only 45 minutes."

"Using dosimetry results to recommend hearing protection"

"The simplest way to use noise dosimetry results is to recommend use of hearing protection whenever noise dose exceeds 50%, particularly if that dose is reached early in the noise exposure period. Initiating protection at a 50% noise dose is more protective, especially for individuals with higher than average susceptibility to NIHL. This also recognizes the potential for exposure to noise throughout the day, rather than limiting potential exposure to the work day only."

One thing is certain, DNL contours are no substitute for actual measurements when it comes to health. With a DNL, you do not measure sound exposure. You get contours. Worse yet, DNL can be misleading. My view is the best practice is to follow the NIOSH recommendations and if exposures exceed the exposure limits, then contact the Navy by all means, but don't just stop there. Keep records. And increase record reliability by occasionally having someone witness the measurements and your record of them. Someday, they may become useful.

SECTION 9.

“NOISE ISSUES” INVOLVING GROWLER FLIGHTS

Aircraft noise is a complex subject matter that has been studied literally for several decades, and remains the primary focus of many research efforts today. Why? Because, over time “noise” generated by and emanating from planes flying overhead has achieved singularity as the largest source of civilian complaints in the realm of Aviation. So too it is on Whidbey Island, in the context of FCLP operations at OLF.

According to the Federal Aviation Administration (hereafter FAA), which governs commercial and private aviation, aircraft noise is regulated through standards that are set internationally. Under the guidance of effective efforts by the FAA over the last 40+ years, internationally accepted standards have divided noise generated by civil jet aircraft into four distinct stages or levels, with Stage 1 being the loudest and Stage 4 being the quietest. Correspondingly, Stage 2 is quieter than Stage 1, and Stage 3 is quieter than Stage 2 (See FAA Publication “Aircraft Noise Issues” www.faa.gov/about/office_org/headquarters_offices/apl/noise_emissions/airport_aircraft_noise_issues/). Currently, within the contiguous United States, civil jet aircraft over 75,000 pounds maximum take-off weight are required to meet Stage 3 or Stage 4 noises to meet noise thresholds for flying. As a result of this attempt to reduce noise, in historical terms, the order of magnitude of noise exposure reduction in the face of the gross number of private and commercial jet aircraft has dropped 90 percent from a high in 1975 to an historical low in 2012. In other words, noise exposure to the civilian population emanating from private and commercial jets was reduced by 90 percent, notwithstanding a large increase in the number of planes flying (Id.)

The experience in the realm of military aircraft is precisely the opposite of the efforts of FAA and the international aviation community. That is to say, the magnitude of noise, by any method of noise measurement resulting from military flight operations in the United States, has increased dramatically at the same time noise from commercial and private flying operations has dramatically decreased.* One reason for that result has to do with the design of particular types of military aircraft to provide more in-flight maneuverability and thrust. Noise has never been a design element for military aircraft.

* In support of my opposition to approval of the DEIS, to expand EA-18G FCLP operations at OLF, I am attaching to this document a portion of a document that analyzes the contentions of the Navy regarding noise, entitled “Outlying Field Coupeville: Its Time Has Passed,” October 16, 2016, prepared by the Technical Committee of Citizens Of Ebey’s Reserve. That attachment is hereby incorporated as a part of my document. While I do not always agree with COER, or with COER tactics, its contributions are acknowledged and appreciated. I believe their efforts have been invaluable, if not popular at NAS Whidbey, and believe they will achieve greater success in the future.

There also is a tactical benefit from having an incredibly loud and fast aircraft whenever the element of surprise is an asset (but there is no body of people in the world who get more noise from aircraft than American citizens who live beneath low-altitude FCLP flight tracks). The design criteria utilized in the development of new aircraft for the military viewed in the context of the increase of public disdain and annoyance for noisy aircraft of any type or kind, has created points of contention, social tension, dismay and anger on all sides of that issue. An experience

in Virginia involving Naval air stations and FCLPs is useful to better understand both or all sides of the issue.

As we all know, FCLP's are designed to train pilots to land aircraft safely on aircraft carriers, and are designed to closely duplicate actual landing procedures at sea. They are essential to both the safety of the Pilot and his/her Electronic Warfare Crewmate, as well as the safety of the \$90 million dollar aircraft and the Aircraft Carrier and its personnel. To best duplicate or approximate reality, it is often said by the Navy that FCLP training procedures should occur from a 600' patterned altitude. As applied to and EA-18G preparing for a carrier landing, I suspect that the plane at some point will have completed a mission at some level other than 600'. But I can see that a consistent 600' altitude might have more to do with holding to a quick or even up-tempo pace when multiple EA-18G's are engaged in FCLP's during the same session. I don't think 600' is a parametrically necessary altitude for the Growler aircraft to perform its mission and land on an aircraft carrier, as inferred by the Navy.

In any event, back to Virginia. Noise levels at both NAS Oceana and NALF Fentress caused FCLP procedures to be raised or increased to 1000 feet and 800 feet, respectively. The increase in altitude for FCLP's is said decrease an element of realism in contrast to actual landings aboard aircraft carriers at sea, but would also decrease noise exported by the aircraft to civilians and military personnel below the flight tracks used for the FCLP's (why cannot altitudes be similarly raised at OLFC?). The Navy thereafter launched an effort to identify a new remote outlying field for FCLP training at a potential cost of \$40 to \$115 million dollars, to eliminate these operational impacts (See Military Aviation and the Environment: Historical Trends and Comparison to Civil Aviation). Initially, the Navy developed plans to locate a new landing field for FCLP in Washington County, N.C., but ran into legal challenges and expanded the search to five other sites, three in Virginia, in Southampton, Surry, and Sussex counties, and two in North Carolina, in Camden and Gates Counties. That plan was later dropped to the delight of the local communities and politicians (See Association of Naval Squadron, Hampton Roads Squadron, For Now, Navy Cancels Search For outlying Landing Field, November 20, 2013).

One issue regarding using OLFC for FLCP operations is that there is very little interaction between the civilians living within the contours drawn for OLFC and the Navy community. Economic or social (See Section 3 and 4, My Comments). Thus, it is accurate to say that the civilian population that lives within the noise contours for EA-18G Growlers and their FCLP's get the noise, thereby shouldering the most unpleasant part of the Navy's insistent use of the OLFC that, originally, was designed to be nothing more than a temporary landing strip. Nothing more. Indeed, its length is significantly shorter than standard length for an EA-18G Growler, that add risk factors to the civilians homes that are within the "conceptual APZ's" (I think that term is a reference to the APZ's that exist in reality but not on paper) that apparently don't matter. Until or unless you live with noise coming from Growlers engaged in FCLPs, you simply cannot have a basis for understanding the adverse impacts. At least on most, normal people.

Here's another Navy risk factor. I guess it is a risk factor perceived by the Navy, but I won't comment upon its motives. What I am broaching, as a topic, is that now, OLFC is fortified by unsightly, unimaginative bare-concrete blocks (each approximately 3' x 3' x 6') tethered one to the next one by a steel cable and creating a "concrete-block-ring" around OLFC. There are hundreds upon hundreds of concrete blocks. As you drive down the State Highway 20, adjacent to OLFC, or along Patmore Drive, or down Keystone Hill, both also adjacent to OLFC, that concrete-block ring is the first thing Tourists and Visitors notice about OLFC. In

contrast, around much of the NAS Whidbey complex, there is a lot of fencing of hog wire with a little barbed wire, and metal stakes. With signs saying something like "Keep Out. Property of the United States." Around OLFC, someone in the Navy decided that fortification of OLFC by approximately 2,000-pound concrete blocks is necessary? The cost (maybe \$5,000,000 - \$7,000,000) of installing that ring was an essential expenditure of taxpayer money? Who does it keep out? Is OLFC in need of stronger protection than the NAS Whidbey and Ault Field? Excuse me for venting, but absent some terrorist plot, I consider the damn thing a visual in-your-face insult to my community, and I have never once been an activist, other than when I took on my kids' school district's poor performance in about 1980. And won. By fighting a PR battle. But maybe an Army of Activists, motivated by a strong sense of being wronged, disregarded, and abused, is what is needed regarding FCLP operations at OLFC. There are Alternatives (See, for example, Section 6, Alternatives for OLF Coupeville, My Comments).

Further, if you consider that noise generated as a result of FCLP's is the worst kind of noise generated on Whidbey Island, causing literal pain at times when the planes are at low altitude and directly overhead, coupled with the knowledge that Growler noise is a burden imposed upon civilians without the Navy having completed or finalized an EIS even for the predecessor aircraft to the Growler, namely, the EA6B Prowler, or the transition of the Prowler to the Growler (although drafts were prepared in 2005 and 2012, but without responding or reacting to public comments, at least publicly), a question arises. Should the Navy be entrusted with the duty to comply with Federal Law and regulations designed to among other things look out for and consider the best interests of the communities in which they are located, when making decisions regarding bringing in more noise? My personal view is that a Subcommittee of the Senate Armed Services Committee, or the Congressional Oversight Committee would be amazed at the proposals sought by the Navy to be unilaterally imposed on a civilian community (Coupeville and its Environs) having mere scant connections to the Navy. And for Coupeville, having the Tourist Element of their economy subjected to being destroyed by more noise, without any analysis of that issue in the DEIS.

The methodology chosen by the Navy to calculate noise is generally misunderstood, perhaps even by the Navy, and understates the full impact of noise on the lives of people who bear the burden of living with it. The Navy uses and defends the use of the Day-Night average sound level (known as DNL) and declares that it is the federal standard for determining community noise impacts. The Navy explains that the DNL is used to determine long-term community noise and land-use compatibility and that it is a 24-hour cumulative noise metric. They don't tell you that they could but choose not to exclude any quiet hours from calculating that 24-hour metric. By using the entire 24-hour period, the noise that generates public complaints and health concerns is diminished and the health threats are, accordingly, understated. Consider, if you will, two aspects of the Navy's noise calculations. The Navy includes the "quiet time" of the night as well as the "noise" from the days when FCLP's are NOT performed (that would be zero Growler noise for those times and days) in reaching their very diluted DNL. Consider how much no-Growler-noise-at-all time a 24-hour, 365 day per year, metric includes. Averaging 45 FCLP-flying days into 365 day year includes 12% of the year days involving Growler flights and 88% of the year when they are not flying. It isn't the 88% that causes hearing losses, it is the 12%, but the actual noise exposure is hidden from view. But not from our ears. Thus, individual noise events should be expected to be significantly louder than 60 dB during FCLP operations. But, remember that by referring to the 60 dB contour line, it makes it possible to say that living in a 60 dB contour is not so bad. However, in contrast, living below a Growler flying at less than 500' and at under 200 knots of airspeed into a head wind and completing a left-turn directly overhead can be the closest thing to a noise hell that exists on this Earth. It truly is unworldly. It is the loudest exposure of any flying aircraft. It is intolerable. To me, I hear a Navy

voice that is saying “enjoy it and if you can’t, get in your car and leave your property until we are finished. We don’t care.” The private contractor the Navy hired to assist in preparing the DEIS has stated “Potential Hearing Loss (PHL) applies to people living long-term (40 or more years) outdoors in high noise environments (Wyle Laboratories, Draft WR 16-02, Aircraft Noise Study for NAS Whidbey Island Complex, Washington, Page A-23 and repeated elsewhere).

For predicting levels of “community annoyance” around airports, the 24-hour average DNL is useful, especially around commercial airports. In commercial airports scenarios, the 24-hour average DNL has been said to be very relevant primarily because commercial airports generally operate much of a 24-hour day and 7 days per week and 365 days per year. For measuring FCLP operations, it becomes bastardized because of the “intermittent” aspects of FCLP operations. FCLP operations are not conducted 7- days per week and are not anywhere close to being conducted 365 days per year. The 24-hour average DNL in essence does not reflect that FCLP operations have more zero days than days when there are any flights. But if you wish to minimize actual burdens of noise, what better way is there than to use the same procedures utilized for commercial airports. Unless you don’t want to be disingenuous. Lastly, let me just point out that in many situations, DNL averages are calculated using only “busy days.” But doing so for OLFC FCLP operations would present an average that would reflect reality.

The essential thing to understand in the context of the DEIS, is that DNL numbers do not tell the real impact. When a Growler comes thundering at 400 feet above your backyard, your noise exposure is high enough for Growler Pilots not to live anywhere near your home. Did the Navy tell you not to live where you live? But if you do, what is your noise exposure when a Growler is overhead, and how long is the duration of its dominating presence in your backyard. And it has been happening about 3,050 times each year. Do you really understand that the Navy is willing to increase their presence in the form of a Growler in your backyard by 575 percent. A 575 percent increase of 3,050 is about 17,550. Right now, the Navy claims there are about 45 FCLP operations flying days per year. That would mean a per flying day average currently of 68. If you (we) are subjected to 17,550 FCLP operations over 45 flying days, that would increase the per day average to 390 if you only get half the Touches or half the Go’s. If you get all the noise all the time, as is the case with Race Lagoon at OLFC, you get a longer duration of noise for each FCLP, one of the factors that should enter into the DNL calculation for Race Lagoon residents, but apparently is not. Also, if there is other than a 50-50% split in the planned use of Runways 14 and 32, the numbers would be affected by the actual split. Moreover, the other flights that create enormous amounts of noise, including arrivals and departures related to FCLP operations as well as arrivals and departure related to Ault Field operations which involve real-life flights directly over or near OLFC at all sorts of altitudes, would increase the real-life DNL numbers for the vicinity surrounding OLFC.

In an article written by an employee of Wyle Laboratories, hired by the Navy to perform the noise calculations included in the DEIS, [REDACTED] states that “the use of the Day/Night Average Noise Level (DNL) metric system alone is questioned as being a flawed system for explaining noise exposure to the average citizen,” and that “this confusion leads to mistrust and the conclusion that DNL underestimates the noise that many citizens experience.” For example in 2009, an outdoor rock concert held at the Virginia Beach Amphitheater was disrupted roughly every five minutes by deafening jet noise. The jet noise was so loud at times that the concert goers complained of not being able to hear the concert. It was reported that even the band was annoyed by the noise. Noise levels by a rock band can reach a range of dB levels from 108 to 114 dB (Federal Inter-Agency Review of Selected Airport Noise Analysis Issues, Table B.1, Federal Inter-Agency Committee on Noise (August 1992). The Virginia Beach Amphitheater is

located within the 65 dB DNL noise zone approximately 5 miles from Oceana NAS. Even though the 24-hour average noise level is 65 dB, the individual noise events that occurred during the concert as jets flew over was likely higher. High enough to blot out the noise or music of the rock band.

The Navy does, in fact, in its recent brochure announcing the public meeting for the EIS, broach the subject of Sound Exposure Level (SEL), by declaring that it represents "the total noise energy of a single event, such as a flyover, as if it occurred in one second." Then a 30 second SEL is chart is shown. The Navy also provides charts showing in actual decibels (dB's), how loud some familiar items are, such as hair dryers, vacuum cleaners, automobiles, jackhammers, lawn mowers, and numerous other items. It is always a bit of a surprise to see that even a conversation isn't that far in DNL terms from Growler noise engaged in FCLP operations. My point is that if you compare in decibels familiar items with Growler noise, measured in DNL's there isn't much difference. The real difference, however, is beyond even the noise from a rock concert, as indicated above.

To now present a draft EIS of a plan to increase the noise levels by increasing the number of FCLP operations from the current 6,100 to some other number as high as 35,100 is absurd and unacceptable. So too it should be unacceptable to Congress, if not to any level of command within the Navy. I have included at the end of this Comment a one page document (although it is undated and not fully attributed to an author, it appears to be a legitimate Navy document, and is available for perusal at www.nrac.navy.mil/docs/2009_exec_summary.pdf). Its value for my purposes is that it points out reality in the context of a lack of effort by the Navy to accumulate noise data, the need to consider noise from an engineering focus, the fact that Navy noise is a growing health issue, that there is a need for developing better procedures to monitor noise exposure, to further develop noise abatement procedures to minimize the noise footprint around Naval Air Stations and to more fully research physiological effects of the full spectrum of noise - including low frequency pressure levels, on humans. To me, the Executive Summary reflects the policy that the Navy should deal more with reality than with fiction or ignoring reality as it relates to continuing FCLP operations at OLFC.

If the Navy wants or continues to insist that they want an OLFC where they can perform 35,100 FCLP's, or more, as by providing training to pilots from other countries (Australia has purchased Growlers and Aussie pilots need training, for example, or if they want to purchase more and more EA18G Growlers and move them to Whidbey Island), they should act responsibly as they attempted in Virginia, to find a location elsewhere that will not subject civilians to unbearable and totally absurd and unacceptable noise events.

In preparing to write my comments in response to the request for public comments regarding the DEIS and its 10 proposals, I took a close look at a document prepared by the Naval Audit Service in its Interim Audit Report in Consideration of Hazardous Noise in the Acquisition of the EA-18G Growler, prepared 10-31-2008, (N2009-0008). In that document it is a bit stunning that so little was done in regard to considering the risk of hearing loss upon anyone, much less Civilian Communities subjected to FCLP noise. That was simply never an issue, although there were alarm bells ringing loudly in the minds of those conducting the audit that both Navy and DoD policies had not been fully met. But then again, maybe that's par for this course.

Lastly, while it isn't my place to question the Navy's wisdom of placing all Growlers of the United States at any single NAS, my instincts may be affected by the knowledge of Pearl Harbor and reading and learning about how very few U.S. aircraft were able to be used to engage the enemy on that infamous day we all remember so well. Ault Field is not even in a harbor,

although it is on the coastline. I don't even know whether its fortifications are as good as those undertaken at OLFC. But what if some Growlers are needed immediately for legitimate reasons in Florida, or Maryland or Delaware, having nothing to do with Aircraft Carriers? All I know is that I have lost confidence in the Navy's wisdom in making decisions, primarily because of its intransigence respecting OLFC and Coupeville and its Environs; and the manner in which it has avoided or ignored the mandates in NEPA, that prefer peaceful coexistence and cooperation instead of "what we got".

SECTION 10.

GROWLER NOISE LEVELS: IMPACT ON HEARING HEALTH

Among the documents included on the website of the Federal Aviation Administration, is a document entitled "Hearing and Noise in Aviation." In that document, the term sound is used to describe the mechanical radiant energy that is transmitted by longitudinal pressure waves in a medium, and that sound waves are variations in air pressures above or below ambient pressure. It then states that the term "sound" describes "the sensation perceived by the sense of hearing" and that all sounds have three distinct variables: frequency, intensity, and duration." The article defines each of those as follows:

"Frequency. This is the physical property of sound that gives it pitch. Since sound energy propagates in a wave-form, it can be measured in terms of wave oscillations or wave cycles per second, known as hertz."

"Intensity. The correlation between sound intensity and loudness. The decibel (dB) is the unit used to measure intensity. The range of normal hearing sensitivity of the human ear is between -10 to +25 dB. Sounds below -10dB are generally imperceptible. [Any person] who cannot hear a sound unless its intensity is higher than 25 dB (at any frequency) is already experiencing hearing loss."

"Duration. Determines the quality of the perception and discrimination of a sound, as well as the potential risk of hearing impairment when exposed to high intensity sounds. The adverse consequences of a short-duration exposure to a loud sound can be as bad as a long-duration exposure to a less intense sound. Therefore, the potential for causing hearing damage is determined not only by the duration of a sound but also by its intensity."

The FAA Article also distinguishes between types of noise and categorizes those as "steady" or "impulse/blast" noise. It describes "steady noise" as "continuous noise of a sudden or gradual onset and long duration (more than 1 second)" and provides examples to include aircraft power plant noise, propeller noise and pressurization system noise" and quotes the Occupational Safety and Health Administration (OSHA) as having determined that the maximum permissible continuous exposure level to steady noise, set forth in a sliding scale, is 90 dB for 8 hours down to a limit of ½ hour for noise intensity of 110 dB per hour, or ¼ hour per day for noise intensity of 115dB (See also, Section 8 - DNL, NIOSH & OSHA, My Comments, regarding lower level noise exposure recommendations by NIOSH). Then it describes examples of impulse noise to include noise from firing a handgun or being in proximity to jet engine noise. Finally, it

warns that if the ambient noise level reaches 90 dBA, you must use hearing protection equipment to prevent impairment (I note that at Sullivan Road the diluted DNL is said by the Navy to be 90 dB DNL, which averages into that calculation both non-flying days and quiet times, and I wonder whether the Navy has publicly warned people who live in that vicinity).

The Internet also reveals the existence of a document entitled "Community Aircraft Noise: A Public Health Issue, prepared by Karen Bowman, MN, RN, COHN-S, of Karen Bowman & Associates, a Seattle-based Environmental Health Specialist who has an Advanced Practice Degree in Community Health Systems and works closely with the Department of Occupational Safety and Health. She is a Professor at the University of Washington in the area of Hearing Health. A copy of that informative report is attached at the end of this Section. The article provides an overview of environmental noise exposure as a public health issue, discusses noise and the anatomy and physiology of the ear and of hearing, indicates how noise exposure is measured and mitigated, as well as noting the health effects of excessive noise exposure including hearing loss, psychosocial impacts of noise exposure, the relationship between noise, stress hormones and health, the interrelationship between noise and immune disturbances, and the interrelationship between aircraft noise and health.

At a minimum, the Bowman Report draws into serious question both the methodology and findings prepared for inclusion in the DEIS regarding noise and its effects on health and education, and serves as a clarion call for the Navy to move into the 21st century in giving appropriate regard to the hearing health of civilians who live below the onslaught of noise imposed by Growler overflights and FCLP's.

The DEIS includes in Appendix A, at page A-52, a Table 5-5 that is entitled "Estimated Aircraft DNL at POI for the Average year No-Action Alternative." I was unable to find a parallel estimate for any of the 9 other possible Navy choices proposed and analyzed in the DEIS. That search included searching the Table of Contents which lists all the Charts, figures and tables prepared for inclusion in the DEIS. I would think that, for example, increasing the number of FCLP's at OLFC from 6,100 to 35,100 might have an impact on the average DNL for the OLFC POI's. If not, that is merely further evidence that the 24-hour 365 day per year average may be little more than a hoax, in the context of assessing whether Growler noise is a threat to the hearing of those citizens who live under FCLP flight paths. Moreover, there are no documents included in the DEIS indicating for various flying days, or up-tempo flying days, the expected levels of total noise exposure at any of the OLFC POI's (there should be far more than a mere 4 POI's for residences near OLFC, in view of as much as a 575% increase in the number of FCLP operation increases).

I would like to draw your attention to the residential portion and the school portion of Table 5-5. The respective DNL "estimates" for Admirals Drive is 79, for Race Lagoon is 61, and for Coupeville Elementary School is 59. If you are not familiar with the location of those places, called POI's for purposes of the DEIS, let me assist you in understanding the geographical relationships between those three locations. When OLFC Runway 32 is used for FCLP operations, Admirals Drive is located at the landing end of the Runway, and close to being directly below the loudest part of an FCLP "touch down." Race Lagoon will receive noise regardless of whether Runway 32 or 14 is used (those are the only runways at the landing strip that is OLFC. It generally lies to the east of both runways, but receives the noise when runway 14 is used because it also is not only east of the runways, it is a bit north of the center spot of the landing strip that is FCLP and would receive a lot of noise associated with "Go" thrust in addition to the "Touch" wheels-down powered landing noise. The Race Lagoon POI is directly below downwind legs of FCLP operations involving Runway 14 at OLFC. To the extent Race

Lagoon is situated to the side of the landing strip, it likely does not receive the maximum noise associated with either the powered landing "Touch" approach or the "Go" take off thrust of an EA-18G Growler. The Coupeville Elementary School lies approximately 3 miles from the center spot of the landing strip that is FCLP and will receive noise primarily after the take off from Runway 32 as the aircraft executes a left hand turn and begins the downwind legs of FCLP's involving Runway 32 at OLFC, preliminary to executing an approach procedure to execute the next touch. It likely involves noise generated by a Growler cruising at 400 to 600 feet.

To me, the "estimated" numbers are highly suspect in terms of a comparison with reality. If you compare the estimated computer-generated modeling numbers for Admirals Drive and Race Lagoon, there is a significant and substantial difference between 79 and 61 dB DNL. If 3 dB is equal to a doubling of sound comparing 100 dB to 103 dB, you do the math for a 5-fold increase projected by table 5-5. To me, those two numbers are statistically improbable in reality. Further, the numbers for Coupeville Elementary School and Race Lagoon are improbably too close to each other, given their respective proximity to their respective proximity to Growlers engaged in FCLP operations. More specifically, Race Lagoon is much closer in proximity to a Growler at either the touch segment or the take off segment of a FCLP operation than the Coupeville Elementary School. There is said to be only a 2 dB difference in estimated noise, based on the Navy's chosen methodology. Further, because Race Lagoon would receive Growler noise when FCLP operations utilize Runway 14 and when Runway 32 is used, it is likely that the DNL of 61, compared to the 79 for Admirals Drive, is understated substantially. Moreover, comparing Race Lagoon with Sullivan Road near Ault Field, to me is suspicious, unless the difference is based primarily on distance from the runway. In any event there is an enormous difference between 90 DNL for Sullivan Road and 61 for Race Lagoon. Do the math to see how much louder is Sullivan Road than Race Lagoon. I also note that, similar to the proximity of Sullivan Road, Keystone Hill Road is parallel to the Runways at OLFC. I further point out that no POI was selected for the entire roughly 4-5 miles of coastline between Race Lagoon and the City of Coupeville. That area receives high levels of noise because many arrivals and departures from Ault Field and not involving OLFC, arrivals and departures before and after FCLP closed loops at OLFC, as well as FCLP's at the point of the final descent when Runway 14 is used and the left turn prior to the beginning of the downwind legs when Runway 32 is used. I guess we must use our own meters to determine noise exposure doses.

Additional comparisons for many of the POI selections also build into the data numbers that are equally suspect and improbable in the real world.

In addition, there are examples of the Navy's own words that belie reality and support the conclusion that the Navy is disingenuous in presenting a fair and balanced record regarding noise. In the DEIS, the Navy declares that Growler flights, at a higher than FCLP altitude, ranging from 6,000 feet to 16,000 feet, would generate noise at ground level between 69 and 84 dB "comparable to the sound level of a passing automobile." While there are studies that place the dB of a passing car in the vicinity of 65 to 76 dB, let us remember that the context in which we are assessing is as to noise in the context of NAS Whidbey and residences surrounding OLFC. A Purdue University Study of Noise Sources and Their Effects (See chem.purdue.edu), characterizes a passenger car at 65 mph from a distance of 25 feet as having a dB level of 77; on the freeway at 50 feet from pavement edge at 76, and measured living room music at 76 dB and a vacuum cleaner at 70 dB. But the notion that Growler noise of between 69 dB and 89 dB is similar in quality to noise of a passing car does not reflect the intensity, frequency, or length of the sound waves produced by a Growler at 6,000 to 16,000 feet, especially if the Growlers are in groups or formations of two or more (often is three flying from NAS Whidbey). The length of even a single Growler at 6,000 or so feet will last 20 or more

seconds, while noise from a car driving by my home on a public street might last 2 seconds. The Navy's comparison is a typical and common effort apparently to understate all noise generated freely by Growlers flying at OLFC.

It should be noted that my comments include statements regarding the flights in and out of NAS Whidbey that occur directly overhead, as viewed from my home. They could be flown under Whidbey Approach Controller direction primarily over water, but instead more often than not are directed from a point near Dugualla Bay to a point between Snakelum Point and Long Point in a southerly or southwesterly route directly over the OLFC. Why the Navy uses this flight direction, in view of the burden of FCLP's conducted from OLFC seems more like spite than anything. Flights continuing over the Saratoga Passageway would impose noise upon far fewer people than upon those that already are imposed upon to the max. The Navy M.O. seems to be to fly over OLFC whenever possible. And in the case of my home, maybe even it hit with some Electronic Warfare (see Section 5, Electronic Warfare Against one Civilian? My Comments).

Moreover, it is elementary that hearing losses are not potential losses in and around OLFC even under the existing and currently used program that anticipates a maximum of 6,100 FCLP operations per year. Hearing losses already have occurred. I, for example, am but one of many who are ready, willing, and able to submit to any objectively conducted hearing tests and you will then better understand that I have lost substantial hearing capacity and ability in the 14 years I have lived below noise generated by Prowlers and Growlers. It didn't take 40 years for that to occur. Moreover, it is noted that attention presently is given by the Navy for its "own people," but not including civilians whose only relationship with the Navy is that of living below FCLP flights and operations.

The Navy's DEIS concludes that the values presented in those tables are only applicable in the extreme case of outdoor exposure at ones residence to all aircraft events occurring over a period of 40 years and that it is highly unlikely any individual would meet all of the criteria necessary to establish a hearing loss attributable to Growler noise. That statement is highly suspect in terms of validity and likely will lead to at least two consequences: (a) a Navy finding of "no significant impact" of any of the proposals contained in the DEIS, and (b) a continuation of an Official Policy of an Agency of the United States of America that denies any relationship between Growler noise and the hearing health of fellow Americans who are subjected to that noise. The Navy's modeling calculations are debunked not only by hearing loss in real people and by numerous studies based on fact rather than the computer-generated models created somewhere in an office rather than in the real world, and in part based upon "data" that is provided by the Navy to Wyle Laboratories and must involve secrets because it isn't put before the public although it involves public health..

One of the issues in this arena is as to cost. It is difficult if not impossible for the general public to finance and repeatedly conduct long-term testing to provide needed data to provide decisive, accurate information. And the Navy seems entirely satisfied nationally to continue to ignore reality and instead to rely upon computer modeling that reaches results seemingly always favorable to the Navy's Three Mice M.O, regarding hearing, seeing, and doing.

Table 5-6, at page A-53 of Appendix A, DEIS, is entitled "Estimated Potential Hearing Loss for the Average Year No Action Alternative and Table 6-8a, at page 77, is entitled "Estimated potential Hearing Loss for the Average Year Alternative 1A. Those figures are based upon computer modeling and the Navy has not revealed any studies based upon data collected during actual FCLP operations when pilots are unaware that studies are being conducted.

Thus, neither the computer models nor their conclusions have been validated by factual data collected in an objective manner.

Regardless of conclusions reached, based upon a computer modeling program, there exist real-life adverse impacts upon real people that are absent from acknowledgement in the DEIS but are not absent in reality. Further, there is an existing program of FCLP operations that could be studied, and many of us are reasonable people who have deep-seated, life-long love of country who also love Whidbey Island, and willingly would assist the Navy in the conduct of a real-life, fact-based study of that existing program. There is a tremendous conflict between being able to live a good life on Whidbey Island and the conduct of any FCLP operations anywhere on Whidbey Island, but especially upon the people who live in the vicinity of OLFC and who have virtually no interrelationship with NAS Whidbey. That conflict is proposed by the DEIS to continue to be ignored in favor of increasing the episodes of noise terror from 6,100 operations per year to as many as 35,100 annual FLCP operations, which represents a multiplication factor of between 5 and 6. In my opinion that would be unconscionable. It is unbelievable, and it is frightening that this kind of behavior by an instrumentality of government could happen in America, especially when it is absolutely clear there are other areas and locations in the western United States that would both facilitate keeping all the aircraft at NAS Whidbey, and provide an alternative FCLP landing strip where NO civilians would be subjected to the worst noise imaginable for a non-military neighborhood or vicinity. That should be the goal of the Navy and of every resident of Whidbey Island who sees Whidbey as their permanent, long-term domicile rather than a temporary, short-term place of residence that often is different from their domicile.

The Navy often is quoted as saying that OLFC is the "best location" and "is designed to provide the most realistic training" for FCLP's. Neither is true if interests other than the Navy interests are a consideration. It also is made in the vacuum of never considering that there are other locations that would be better than OLFC. Also, the Navy's intransigent position flies in the face of their mantra that they "want a dialog" with members of the community and that they "want to be a good neighbor." In fact, the OLFC is nothing more than a bare bones landing strip (plus an approach radar set and a couple of bare bones buildings) that has no permanent personnel assigned to it and could be duplicated and improved upon by a replacement landing strip built elsewhere. For example, a new runway could be a longer runway more suitable for landing EA-18G's rather than the "short" 5,400 strip at OLFC, thereby eliminating the risk to Civilians who live in the Navy's self-described "conceptual" Accident Protection Zones. The Navy presently has EA-18Gs fly to other locations in both Washington and Oregon for the conduct of several other forms of training, including in the Navy's own words "Growler aircraft that are transiting from Ault Field . . .to nearby military training areas (Olympic, Okanogan, Roosevelt, and NWSTF Boardman, for Electronic Warfare Training, Low level military flying tactics, and utilizing weaponry aboard a fully loaded ready-for-action Growlers. ." It would not constitute a large or long step to remove FCLP training from Whidbey Island. Thus, there exists several levels of precedents for training EA-18G pilots and crew other than at OLFC or NAS Whidbey.

Further, the cost of a selected new landing strip or two landing strips is relatively slight on a national scale but would have tremendous benefit both to NAS Whidbey and OLFC by ridding Island County of the extreme burden involuntarily imposed and proposed to be increased by intolerable and totally unacceptable levels that would devastate the civilian population who live in the vicinity of OLFC and would impose warlike levels of noise upon civilians who get no benefits from having the Navy as a community member. The time has come for the Navy to get real and work to resolve the OLFC burden and issues by finding a different site and location

upon which FCLP operations could be performed without burdening any civilians or military personnel.

If the Navy really loves OLFC, why have they never sought to make it a permanent part of NAS Whidbey, and build some housing onsite at the OLFC for Navy personnel like Growler Pilots and their families and Crew. The obvious answer is they likely would have a mutiny because of the obvious and numerous issues associated with living anywhere close to a facility that conducts FCLP operations.

One last bit of news as I close this Section. In 2013 and 2014, the United States Navy decided to expand its NAS Key West training program to include 52,000 FCLP operations for the F/A-18E/F aircraft in Florida. In response, a retired Officer with 25-years of service service in the United States Navy, on January 21, 2014, referred to the Federal Bureau of Investigation (FBI) an allegation that a 2003 Environmental Assessment for Fleet Support (EA) prepared and submitted by the Navy was in violation of 18 U.S. Code Section 1001, as well as other federal laws, by knowingly and willfully making materially false statements. The EA had reached a finding, expressed in a Navy Record of Decision (ROD), of "No Significant Impact." (See The Blue Paper, The Key West Newspaper, Navy Jet Noise: Hammerstrom Calls in the FBI).

SECTION 11.

VIBRATIONS AND CONCUSSIVE SOUND WAVES: EFFECTS OF THOUSANDS OF REPEATED EA-18G "GROWLER" FLIGHTS ON THE BLUFFS OF WHIDBEY ISLAND

It is well known that there are seismic fault lines that run through, under, or near Whidbey Island. In addition, a visit to the available earthquake monitoring/reporting websites reveals a history of earthquakes in the vicinity of Whidbey Island. Further, many small, some medium, and a few relatively large landslides have involved the various bluffs of Whidbey Island. In the past few years, one medium slide occurred approximately 600 feet to the west of my property, taking approximately 600 - 900 cubic yards of glacial till from about 10 feet down from the edge of the bluff all the way to the water line, along with two dozen or so uprooted, mature trees. The width of that slide was approximately 100 feet. This past year a small slide occurred precisely on Kineth Point destroying the use of approximately 30 - 50 cubic yards of glacial till material. The point to be taken here is that the coastal bluffs of Whidbey Island are comparatively fragile and in danger of being damaged or destroyed, and should be protected from abuse by any person or entity, including the Navy. Effectively, all of the coastline of Whidbey Island is owned by the Federal, State or Local Government, or by private parties like myself. To me, it is quite valuable and treasured. In other parts of the United States where FCLPs are performed, including Florida where F-18s engage in FCLP operations, there are no bluffs at low level approaches to landing strips.

Prior to purchasing the lot upon which my home was constructed in 2002, I secured the study of a Geologist regarding the stability of the bluff that is on the waterfront. The Geologist concluded that there was "no significant geologic hazard exists at the subject undeveloped lot." He further stated that "[t]he extremely steep coastal bluff segments southwesterly of Long Point and southeasterly of Snakelum Point have been the erosional feeder bluffs for deposition of the respective cusped spits or "points", during the past several thousand years. The steep bluff of glacial till, from 50 to 100 feet high, below the Kineth point Woods subdivision is a minor feeder bluff that contributes to gravelly sediments on Rodena Beach, a pocket beach with relatively little erosion of the low coastal bluff below (my lot). . . . That situation augurs well for minimal bluff erosion along the northerly edge of (my lot)." He later quantified for me the average annual erosion to be expected on the bluff that fronts on my property, as being one-half inch per year.

My acre-sized Garden is one of the finer ones on Whidbey, and often is sought by others for us to be the host for a garden tour. Last year, we hosted the Whidbey Island Garden Tour (a 100% charity fundraiser) attended by about 650 people over a 6-hour viewing window, as well as several other smaller tours. We have hosted an average of 4-5 tours over the past 10 years, including several from Canada and other parts of the

United States. We have spent thousands of hours working in the Garden notwithstanding the extreme noise and nuisance imposed upon us by the Navy. It is during that large part of time, working in the garden, (working without the benefit of a Navy warning to wear ear protection, primarily because of Navy assurances that there was no need to do so) that gives us a high degree of experience feeling the concussive effect of the sound waves and vibrations, generated by both Prowlers and Growlers. It is our position that the Growlers generate a substantially greater degree of vibrations and concussive sensations. Recent research tends to verify that fact by recognizing that the Growlers' engines generate a more powerful, lower-frequency sound wave than the Prowlers.

The Navy, in its latest DEIS, recognizes that fact and discusses it in the context of structures at NAS Whidbey, Indian Burial Grounds, and other historic sites, but does not discuss or even mention the Coast Line and high bluffs that in essence surround much of Whidbey Island.

It is my belief and opinion that there is a **cumulative effect of frequent Growler flights, especially at levels below 600 feet, as is common with FCLP operations at both NAS Whidbey and OLFC, upon the relatively fragile bluffs of Whidbey Island, and that it is gross negligence for the Navy to continue to ignore the potential for danger of contributing to more and more landslides.** Who can say with scientific certainty that the large landslide that occurred on the west side of Whidbey Island about 5 years ago (about the time Growlers were beginning to arrive at NAS Whidbey), was NOT in part due to Growler-generated vibrations and sound waves?

The DEIS, prepared by the Navy, does not discuss, scientifically, with the assistance of credible geologists and others with landslide expertise, and without a Navy bias, the present and future impact of vibrations and concussive aspects of sound waves generated and distributed by any EA-18G flights. Neither does it discuss the likelihood that up to 36,100 flights at low levels over the relatively fragile coastline of Whidbey Island as contemplated by the No Action Alternative or by Scenario A, B, or C of Alternative 1, 2, or 3 in the DEIS, might or could or definitely will have an adverse impact on the coastline of Whidbey Island.

While the DEIS does contain an acknowledgement that architectural resources "within NAS Whidbey" and its immediate surroundings may be impacted by noise and vibration from the operation of Growler aircraft (DEIS, pages 4-193-195), it quickly concludes that damage would not be expected because sound levels do not reach a weighted 130 dB level. **There is no attempt to provide credible documentation as to whether there is the likelihood of a cumulative factor in weighing the possibility of a noise or sound induced landslide, or whether a lower threshold than 130 dB would or could not trigger a destructive landslide on Whidbey Island, especially where there exists and has existed long before the arrival of the Navy on Whidbey Island fractures and fissures from prior times.**

Once there is a landslide, there is no possibility of a repair. The Coastline of Whidbey Island is relatively unique. As such, it should be guarded and protected, not ignored. Most of the houses built on Whidbey's bluffs were built with a government-issued building permit and were completed and inhabited long before the arrival of Growlers with their low-frequency noise generating engines. It is time for the Navy to engage in meaningful study of this issue. If it is the Navy's position that they would prefer to destroy the coastline of Whidbey Island, then maybe it is time for the Navy to simply buy miles of shoreline properties and raze all structures. At least, then the Navy could have ownership of ingress and egress avenues at any level. It may well be an abuse of power for the Navy to continue to engage in Growler activities that may well destroy privately-owned waterfront lands of Whidbey. Especially considering that there are many reasonable alternatives to conducting FCLP operations at OLFC (see Sec. 6, Alternatives to OLFC, My Comments).

SECTION 12.**HEARING HEALTH ISSUES AND GROWLERS, UNTIL F-35'S ARRIVE**

“The mission of the Navy is to maintain, train and equip combat-ready Naval forces capable of winning wars, deterring aggression and maintaining freedom of the seas.” [navy.Mil.com](http://navy.mil.com)). In more detail, the Secretary of Defense sets forth the Primary Missions of the U.S. Armed Forces at the website (archive.defense.gov/news/Defense_Strategic_Guidance.pdf). Neither statement mentions interactions with between Navy's leaders and American Civilians who happen to live in the vicinity in which Naval training occurs. However, it is clear that the Navy's authority is limited, restricted, and subject to the rights and obligations of every American set forth in the Constitution of the United States and in hundreds of Federal Laws. NEPA is one of those laws. It was enacted in the full day (or glare) of both the Constitution and other laws.

It is my personal opinion that the Navy, as fine an organization as it is, and as critical as it is to the safety and security of the United States, indeed much of the World, sometimes focuses more attention to its mission as a Branch of the Armed Forces of the United States to the exclusion of its limitations and obligations set forth in both the Constitution and in various laws, including NEPA (See, for example, Section 1, My Comments). My purpose here is not to focus on the excesses of the exercise of Naval Power, rather it is to emphasize the impacts the Navy is having on the hearing health of actual real live American Citizens, and the impacts it is threatening unilaterally to impose upon some of the people who live in the vicinity of OLFC.

Initially, I concede that it is absolutely impossible to persuade any Officer of the United States Navy, except privately, that the Navy in the past is guilty of excesses in exercising its considerable power as it relates to Citizens who happen to live in the vicinity of OLFC. I am aware of what happens to Officers who do not adhere to enforcing a decision made up the chain of command. I sincerely doubt that any Officer assigned to NAS Whidbey has authority to, or wants to change a significant decision made at a higher level of Command. I recall an incident in my own Air Force career of six years. While I had a very fine record, including being offered (and accepted) a Regular Commission upon graduating quite high in my OTS Class, heading a maintenance and operations squadron at Cross City, Florida, that in the 15 months following my assignment to that unit, went from 117th of 119 identical or similar units within the North American Air Defense Command to First of 119 with the same senior NCO staff in place when I arrived (and received a Commendation Medal for my success), was selected for Special Career Monitoring (Top 2% of officers, as rated). While at a remote assignment in my last year (I had been extended one year at the time I submitted my letter of resignation), I was a lowly Captain, in charge of maintaining the various pieces of equipment for an AC&W Squadron and received a package (a copy of which went to about 10 Officers in other locations and of higher ranks than mine, up to the Commander of the Pacific Air Force. The package was in regard to the installation of an additional height-finder radar. The one we had was used only about 25% of its capabilities. I didn't think we needed to spend money for another, so in my comments, solicited of all people who received copies of the package, I spoke the truth, and included a political statement, about the future use of the planned installation. A few days later, I began to receive phone calls from the three officers immediately above me. They were basically one-sided conversations. Six months later, just before installation was planned to commence, the installation project was canceled, but my phone remained silent.

My point here is that it is necessary, sometimes, to provide information that may seem at odds with prior decisions. However, how can a decision that is at odds with new evidence or with reality be modified or revised, or scrapped, if someone doesn't take the lead and provide that information. You can't force someone to read new information, but you can nonetheless provide the information without endangering your career. But not always, I understand.

I also understand that the manifestation of the effects of excessive exposure to noise may be delayed by a period of time. Even decades. But hearing losses of people exposed to Navy Aircraft noise are a reality today. At one time long ago, hearing protection devices were not a part of the Navy's uniform-of-the-day. Things changed, but Billions of Dollars are being spent by American Taxpayers for disability benefits for Navy personnel. And warnings abound for Navy workplaces having very high levels of noise exposure, in terms of intensity and duration.

Further, in reality there is no worse levels of, or exposure to, noise for citizens who have no direct relationship with the Navy, than the noise associated with a continuous stream of F-18E/F's or EA-18G's flying FCLP's. For people living below the flight paths and near the landing strip or runway for the incumbent Touches and Go's, the noise is disruptive, intrusive, unwelcome and dangerous. I believe strongly that there exists sufficient medical and Navy-generated information to cause a reasonable person to want to know and understand the actual noise levels to which citizens who live near OLFC are subjected to involuntarily. Continued Navy denial of the existence of actual levels of noise that endanger the future hearing of many of us, viewed in the light of the burgeoning mountain of evidence that high levels of noise are dangerous, could become a stain on the Navy's reputation. I do not believe continued reliance on the mantra that projected noise contours drawn by or in accordance with NOISEMAP projections that have never been verified (or ever publicly acknowledged as having been verified) is acceptable. The Citizens whose hearing is an issue deserve better. The Navy obligations in this regard are clear, under NEPA and the Constitution of the United States, to which the Navy is subject.

SECTION 13.

GROWLER NOISE AND COMMUNITY HEALTH

The DEIS, in the context of considering the distinct possibility, indeed probability, that Growler Noise, including existing single noise events as well as the cumulative impact of noise exposure from frequent Growler FCLP operations, coupled with primarily Growler noise from overflights of Aircraft engaged in flying to scheduled activities elsewhere or returning to NAS Whidbey where the flight tracks of those overflights are directly over the OLFC, is a contributing factor to the health of the civilian population that lives below is little more than an embarrassment of gobbledegook. It is nothing more than a whitewash seemingly designed to facilitate reaching a decision of "No Significant Impact" for whichever proposal is selected and imposed by the Navy.

For each of the Alternatives proposed by the DEIS, a single paragraph is devoted to the "Nonauditory Health Effects." Let me quote the paragraph attendant to Alternative 1, and you need not refer to the paragraph for the other Alternatives. It reads the same except the "1" is replaced by a "2" or a "3":

"Nonauditory Health Effects"

"Per studies noted and evaluated in Section 3.2.3 [entitled "Noise Effects"], the data and research are **inconclusive** with respect to the linkage between potential nonauditory health effects of aircraft noise exposure. As outlined within the analysis of DNL contours and supplemental metrics presented within this section, the data show that the Proposed Action would result in both an increase in the number of people exposed to noise as well as those individuals exposed to higher levels of noise. However, research conducted to date has **not made a definitive connection** between intermittent military aircraft noise and nonauditory health effects. The results of most cited studies are **inconclusive and cannot identify a causal link** between aircraft noise exposure and the various type of nonauditory health effects that were studied, **An individual's health is greatly influenced by many factors known to cause health issues, such as hereditary factors, medical history, and life style choices regarding smoking, diet, and exercise. Research has demonstrated that these factors have a larger and more direct effect on a person's health than aircraft noise.**"

That is an unbelievable statement coming from an entity of government charged with protecting our homeland and its citizens, including civilians who live in the vicinity of Coupeville, indeed who live on Whidbey Island, not to mention military personnel and their families. It reads in contradistinction to the experiences of military personnel who have sought and received treatment for excessive noise exposure while on active duty. Essentially, the quoted paragraph disregards the studies that already exist, showing that there are adverse impacts on human health other than auditory health. How can the Navy not even acknowledge that there is at least a "potential" for a relevant correlation. Is it because that might preclude justly reaching a future finding of "No Significant Impact" for any of the proposals contained in the DEIS?

Further, the reference at the beginning of the paragraph quoted above references "studies noted and evaluated in Section 3.2.3." A reading of Section 3.2.3 reveals over a dozen references to statements or partial quotes regarding noise in the context of annoyance, speech interference, classroom/learning interference, sleep disturbance, potential noise effects on recreation, potential hearing loss, non-auditory health effects, and vibrations from aircraft operations. The

quoted paragraph then characterizes the studies in the following words: "inconclusive data and research, no definitive connection between "intermittent" noise and health, studies are inconclusive, and that factors other than noise have a "larger and more direct effect." Those words, if permitted by the Navy leadership to carry the day, the Navy in my opinion one day will rue them. Bigly. The effect of those words is to say that, notwithstanding any and all objective studies conducted to date, the burden of proof is upon the people who today may continue to be damaged and injured by actions of the Navy, and that the Navy has no interest in listening or learning or studying any possibility to the contrary.

It also shows that, because of this Navy intransigence in the face of mounting evidence to a contrary position, it is difficult if not impossible to have any faith or confidence in the Navy to make the right choice or do the right thing regarding any aspect of the continued Navy use of OLFC.

The position of the Navy disregards all evidence and research, subjective and objective, that increasing the number of FCLP's at OLFC from 6,100 to as many as 35,100 per year will NOT affect some children, mothers, fathers and others.

For the Navy not to even admit there is a possibility that conducting FCLP operations at OLFC under the present levels of 6,100 FCLP operations per year, nor by increasing those levels by a factor of about 5.75, might have adverse health impacts, is to cast a deep and dark shadow upon the leadership of the Navy that should be made known on a widespread basis to both the public and to federal and state elected officials. That is a position that lives in contradistinction to a different story presently unfolding regarding the effects on some peoples' health of living and working around gross and horrific noise conditions. All of us deserve and should demand that due consideration be acknowledged, planned, and given to the health and welfare of all the people who live in the vicinity of OLFC as well as the military personnel and civilians who live near NAS Whidbey even for the present levels of FCLP operations conducted on Whidbey Island.

My own personal experience with High Blood Pressure is one subjective example of a probable connection between living near OLFC and the onset of high blood pressure. I have undergone an annual physical examination I believe for each of the last 30 years and my blood pressure has been measured many dozens of times in many differing situations. My record reveals that prior to moving to Whidbey Island, I never was in need of medication to control or lower my blood pressure. A few years after moving to Whidbey Island, I was diagnosed as being in need of medication for blood pressure, notwithstanding that I have lived on Whidbey Island a near storybook life of relative and selective seclusion. Building a world class garden for my wife and I to enjoy. In that, I believe I have succeeded. I will be the first to admit that the impact of aging likely is a contributing factor to an increase in high blood pressure events. However, I also will swear, under oath, that during periods when FCLPs are undertaken at OLFC, those are the only periods of time when I feel a sense of helplessness to combat anxiety, anger, rage, and a slow burning seething of knowing that the honorable United States Navy doesn't want a true delineation of factual reality, it simply wants to complete a superficial, understated response to a Federal requirement to prepare an assessment of the impact of a Navy plan that already has been approved in concept if not in particulars and then make a finding of "No Significant Impact" upon my life and those of the many of us who live below the noise generated by Growlers. Further, it is documented that when I leave Whidbey Island (I sometimes spend a few weeks each year year in Hawaii), my blood pressure after a few days returns to normal levels. Even during periods when FCLP operations are not prevalent at OLFC, I seem to have lower high blood pressure events. I mention my own personal history in this regard not to seek sympathy

or empathy but merely to indicate that continued intransigence on the part of the Navy, as by refusing to acknowledge the obvious, is slowly being exposed as unconscionable and calloused, and in defiance of the real world in which peoples' lives are being adversely impacted by Growler FCLP landing noise, at least in the context of OLFC.

One other aspect of the Navy's "No Significant Impact" position on the conduct of FCLP operations at OLFC bears discussion. It is true and undeniable that, considering only the computer-generated modeling upon which the DEIS clearly is based, that no one can measure adverse impact on land, buildings, animals, or people. But to conclude that because medical, health and other areas of study do not definitively conclude that damages and adverse impacts are measurable is not a justifiable or logical basis to conclude that there is no damage or adverse impact. For example, no one can predict with certainty whether any one person will succumb to the ill effects of influenza or a virus-induced nasal or respiratory infection. Some people whose immunity systems are strong may well not become a victim this year to a cold or the flu. Some of those same people next year may well become victims to the same or similar diseases. The fact is, however, that some people fall victim to colds and the flu and some do not. However, using Navy logic, there is no clear linkage or convincing connection between presence on any Navy base and catching a cold or the flu, and that, therefore, there is no need to have good hygiene in terms of cleanliness on a NAS.

My point is that the fact that "causation" is not fully known, or that personal susceptibility is not fully known, does not mean there is no causal connection between aircraft noise, especially the concentrated nature of FCLP noise, and health issues that may shorten people's lives or adversely impact their ability to live a good life. Further, in the context of children, some kids are susceptible to or actually may be diagnosed as having Attention Deficit Disorders (ADD), and one consequence of such a diagnosis may be inability of a child with ADD to focus or stay on task during school. To say that "intermittent" interruptions or distractions inherent in FCLP Growler noise is not a "Significant Adverse Impact" is to defy common sense and basic logic. Those impacts certainly are worthy of consideration by the Navy before the episodes of interruption and distraction are increased by a factor of up to 5.75. The lives of all children are significant and should not continue to be ignored and disregarded by the Navy and its continued use of OLFC.

Consider the data NOT included in the DEIS. While there is a Table that shows for each POI the "Maximum Sound Exposure Level and Maximum Sound Level for the POI's it doesn't project those levels for the FCLP's contemplated by each of the 9 proposals. Instead, the DEIS gives us the actual number of times that the projected maximum SEL is reached per year. A range, including all FCLP's in a year would seem to be a good thing to know if you want to assess the annual, monthly or daily exposure levels and compare those with the limits set by OSHA and NIOSH. Of course, that would depend upon the number of FCLP's projected to use Runway 14 and 32 at OLFC, on each flying day as well as the number of flying days projected, as well as the overflights of arrivals and departures from Ault Field that entail flying over OLFC, and as well as arrivals and departures from OLFC FCLP closed loop patterns.

The DEIS also indicates the number of people at OLFC who are estimated at risk for hearing loss (See, for example, Table 6-8a for Alternative 1, Scenario A). But there is nothing to suggest where those projected people live, work or lie in a bed at the Whidbey General Hospital. It tells you how many people there are within each Leq 24 band, but it doesn't tell you how to convert those band numbers to DNL contours or where those numbers are on the contour maps. I expect that its only real value is to provide a basis for claiming that the number of people isn't

very large. But if past practice is tomorrow's guidance it will be used by the Navy only for defensive purposes, as if we are talking about a game. A game with civilians' lives.

I would like to provide my perspective and analysis regarding health issues, because those are important. While I have children, grandchildren and great grandchildren, none live anywhere close to Whidbey Island. But I care about people on Whidbey Island who live around OLFC. I care about the pregnant mothers with their unborn fetuses with developing ears, and I care about kids playing softball or soccer outside and below FCLP flight paths, and I care about all the people, many retired, who have developed a love of gardens and gardening whose hearing already has suffered, notwithstanding the Navy's mantra that hearing losses won't occur without 40-years of Growler noise.

I strongly believe the Navy does not care, not because they are cold and calloused individuals, but because the information in the DEIS facilitates a finding of not much impact ever, anywhere, while discrediting a private study finding that the Navy projections fall short of reality and notwithstanding a second private study that apparently validates the first study's integrity. My ultimate conclusion is that if those of us disheartened by Navy internal politics and their DEIS's really care, we must take the fight into the public arena of politics and policy at the state and national levels. There is a right side and a wrong side to continued use of OLFC, and I believe the Navy cannot be trusted to do the right thing and find a permanent solution to safeguard the people's rights to enjoy life in the manner contemplated by NEPA and the Constitution of the United States of America. It is up to us, here on Whidbey Island, to assist the Navy in doing the right thing. The Navy has a voice but cannot hear.

A replacement location for a new OLF is the only answer that avoids considerable adverse impacts on many if not most all of us civilians who live in the vicinity of OLFC. Further, the existing level of FCLP operations at OLFC has never adequately considered any adverse impacts on the health of the civilians who live with Growler noise and impacts; and those impacts could be avoided with a little Navy leadership to find an alternative site for FCLP operations and activities.

There is a study of Aircraft noise at OLFC during FCLP operations, secured by Citizens Of Ebey Reserve (hereafter COER) and performed by JGL Acoustics Hereafter JGL). JGL took actual measurements from five locations near OLFC during Growler flights that utilized Runway 32 in the performance of FCLPs in 2013. The JGL Noise Study referenced above revealed that the projections in a computer modeled program forming the data for the analysis of the Navy and of Wyle Laboratories set forth in the DEIS understated the true, actual noise levels.

It is noteworthy that I am unable to find a single reference to a study secured by the Navy utilizing actual recorded measurements, or verifying its earlier projections. It follows that there is no preserved data upon which to build a library that might be useful, if referencing actual facts ever becomes a noble course of action. In fact, there are references in writings to actual measurements taken by the United States Air Force in the context of noise generated by Air Force aircraft. In the context of OLFC, actual measurements might show that the projections of noise at OLFC by the Navy are too high or too low. Wouldn't it be useful, educational, and revealing to test the relative accuracy of the Navy's projections? What possibly might be the rationale behind the policy of the Navy's disinclination to using actual measurements?

But there is an enormous amount of information, alarming information, that noise is dangerous not just to a person's hearing. The Centers for Disease Control and Prevention, on February 8, 2016, posted an article entitled "[Understanding Noise Exposure Limits: Occupational vs.](#)

General Environmental Noise. In regard to non-auditory health effects, the article reads, in part, as follows:

“The most investigated non-auditory health endpoints for noise exposure are perceived disturbance and annoyance, cognitive impairment (mainly in children), sleep disturbance, and cardiovascular health. WHO estimated that in high-income western European countries (population about 340 million people), at least 1 million healthy life-years (disability-adjusted life-years (DALY’s)) are lost every year because of environmental noise.” “Most of these DALYs can be attributed to noise-induced sleep disturbance and annoyance. DALYs=Disability-adjusted life years.”

“Annoyance. Annoyance is the most prevalent community response in a population exposed to environmental noise. Noise annoyance can result from noise interfering with daily activities, feelings, thoughts, sleep, or rest, and might be accompanied by negative responses, such as anger, displeasure, exhaustion, and by stress-related symptoms. In severe forms, it could be thought to affect wellbeing and health, and because of the high number of people affected, annoyance substantially contributes to the burden of disease from environmental noise (figure 2). Investigators have proposed standardised questions about residents’ long-term annoyance in their home for use in surveys. Additionally, investigators have gathered substantial data for community annoyance in residents exposed to noise in their home, based on which exposure–response relationships were derived (eg, for wind turbines). These relations can be used in strategic or health impact assessments for estimating long-term annoyance in fairly stable situations. Although the overall community response depends on societal values and is most relevant to the guidance of policy, several personal (eg, age and noise sensitivity) and situational characteristics (eg, dwelling insulation) might affect the individual degree of annoyance.”

“Cardiovascular disease. Both short-term laboratory studies of human beings and long-term studies of animals have provided biological mechanisms and plausibility for the theory that long-term exposure to environmental noise affects the cardiovascular system and causes manifest diseases (including hypertension, ischaemic heart diseases, and stroke). Acute exposure to different kinds of noise is associated with arousals of the autonomic nervous system and endocrine system. Investigators have repeatedly noted that noise exposure increases systolic and diastolic blood pressure, changes heart rate, and causes the release of stress hormones (including catecholamines and glucocorticoids). The general stress model is the rationale behind these reactions. Potential mechanisms are emotional stress reactions due to perceived discomfort (indirect pathway), and non-conscious physiological stress from interactions between the central auditory system and other regions of the CNS (direct pathway). The direct pathway might be the predominant mechanism in sleeping individuals, even at low noise levels. Chronic exposure can cause an imbalance in an organism’s homoeostasis (allostatic load), which affects metabolism and the cardiovascular system, with increases in established cardiovascular disease risk factors such as blood pressure, blood lipid concentrations, blood viscosity, and blood glucose concentrations. These changes increase the risk of hypertension, arteriosclerosis, and are related to severe events, such as myocardial infarction and stroke. Studies of occupational and environmental epidemiology have shown a higher prevalence and incidence of cardiovascular diseases and mortality in highly noise-exposed groups. The risk estimates for occupational noise at ear-damaging intensities tend to be higher than are those for environmental noise (at lower noise levels). Because of different acoustic characteristics for different noise sources (sound level, frequency spectrum, time course, sound level rise time, and psychoacoustic measures) noise levels from different noise sources cannot be merged into one indicator of decibels. Different exposure–response curves are needed for different noise

sources. Meta-analyses were done to quantitatively assess the exposure–response link for transportation noise (exposure to road traffic and aircraft noise) and health effects (hypertension and ischaemic heart diseases, including myocardial infarction). The investigators derived increases in risk of between 7% and 17% per 10 dB increase in equivalent noise level LAeq (figure 3). Their results have been adjusted for known risk factors such as age, sex, socioeconomic status, smoking, body-mass index, and others. The researchers identified sex and age as effect modifiers. Studies of the combined effects of noise and air pollution showed largely independent effects, which can be explained by different mechanisms of how both exposures can affect health (cognitive and autonomic stress response vs inflammatory processes).”

“Cognitive performance . WHO estimate that about 45 000 disability-adjusted life-years are lost every year in high-income western European countries for children aged 7–19 years because of environmental noise exposure (figure 2). Postulated mechanisms for noise effects on children’s cognition include communication difficulties, impaired attention, increased arousal, learned helplessness, frustration, noise annoyance, and consequences of sleep disturbance on performance.^{3, 56} Investigators have also suggested psychological stress responses as a mechanism because children are poor at appraising threats from stressors and have less well developed coping strategies than do adults. Areas with high levels of environmental noise are often socially deprived, and children from areas with high social deprivation do worse on tests of cognition than do children not exposed to social deprivation. Therefore, measures of socioeconomic position should be taken into account in the assessment of associations between noise exposure and health and cognition.”

“More than 20 studies have shown environmental noise exposure has a negative effect on children’s learning outcomes and cognitive performance,⁵⁷ and that children with chronic aircraft, road traffic, or rail noise exposure at school have poorer reading ability, memory, and performance on national standardised tests than do children who are not exposed to noise at school. Investigators have examined exposure–effect links between noise exposure and cognition to identify the exposure level at which noise effects begin. The RANCH study of 2844 children aged 9–10 years attending 89 schools around Heathrow (London, UK), Schiphol (Amsterdam, the Netherlands), and Madrid-Barajas (Spain) airports showed a linear exposure–effect relation between aircraft noise exposure at school and a child’s reading comprehension and recognition memory after adjusting for a range of socioeconomic factors. A LAeq 5 dB increase in aircraft noise exposure was associated with a 2 month delay in reading age in children in the UK and a 1 month delay in those in the Netherlands. These linear associations suggest that there is no threshold for effects and any reduction in noise level at school should improve a child’s cognition.”

“WHO Community Noise Guidelines⁶³ suggest that the background sound pressure level should not exceed LAeq 35 dB during teaching sessions. Intervention studies and natural experiments have shown that reductions in noise exposure from insulation or the closure of airports are associated with improvements in cognition, suggesting that noise reduction can eliminate noise effects on cognition.”

“Sleep disturbance. Sleep disturbance is thought to be the most deleterious non-auditory effect of environmental noise exposure (figure 2), because undisturbed sleep of a sufficient length is needed for daytime alertness and performance, quality of life, and health. Human beings perceive, evaluate, and react to environmental sounds, even while asleep. Maximum sound pressure levels as low as LAmax 33 dB can induce physiological reactions during sleep including autonomic, motor, and cortical arousals (eg, tachycardia, body movements, and awakenings). Whether noise will induce arousals depends not only on the number of noise events and their acoustical properties,² but also on situational moderators (such as momentary

sleep stage66) and individual noise susceptibility. Elderly people, children, shift-workers, and people with a pre-existing (sleep) disorder are thought of as at-risk groups for noise-induced sleep disturbance. Repeated noise-induced arousals interfere with sleep quality through changes in sleep structure, which include delayed sleep onset and early awakenings, reduced deep (slow-wave) and rapid eye movement sleep, and an increase in time spent awake and in superficial sleep stages. However, these effects are not specific for noise, and generally less severe than those in clinical sleep disorders such as obstructive sleep apnea. Short-term effects of noise-induced sleep disturbance include impaired mood, subjectively and objectively increased daytime sleepiness, and impaired cognitive performance. Results of epidemiological studies indicate that nocturnal noise exposure might be more relevant for the creation of long-term health outcomes such as cardiovascular disease than is daytime noise exposure, probably because of repeated autonomic arousals that have been shown to habituate to a much lesser degree to noise than other—eg, cortical—arousals.² In 2009, WHO published the Night Noise Guidelines for Europe, an expert consensus mapping four noise exposure groups to negative health outcomes ranging from no substantial biological effects to increased risk of cardiovascular disease (panel 2). WHO regards average nocturnal noise levels of less than LAeq, outside 55 dB to be an interim goal and 40 dB a long-term goal for the prevention of noise-induced health effects.”

“Conclusion. “Noise is pervasive in everyday life and can cause both auditory and non-auditory health effects. Noise-induced hearing loss remains highly prevalent in occupational settings, and is increasingly caused by social noise exposure (eg, through personal music players). Our understanding of molecular mechanisms involved in noise-induced hair-cell and nerve damage has substantially increased, and preventive and therapeutic drugs will probably become available within 10 years. Evidence of the non-auditory effects of environmental noise exposure on public health is growing. Observational and experimental studies have shown that noise exposure leads to annoyance, disturbs sleep and causes daytime sleepiness, affects patient outcomes and staff performance in hospitals, increases the occurrence of hypertension and cardiovascular disease, and impairs cognitive performance in schoolchildren. In this Review, we stress the importance of adequate noise prevention and mitigation strategies for public health.”

The mountain of evidence is growing. While I cannot vouch 100% for the validity of the enormous data that exists, isn't it better to tread on the side of caution than to expect civilians to follow the Navy's lead and just ignore serious and documented health issues? Is that all we can expect from the United States Navy?

Andrew Carnegie once said “as I grow older, I pay less attention to what men say. I just watch what they do.” Actions or intransigence by the Navy do speak to in a far louder voice than the words they chose for the DEIS.

SECTION 14.

NAVY AVIGATION EASEMENTS NEAR OLFC: A BAD OF NAVY LEADERSHIP AND COMMUNITY INTERACTION

An Avigation easement is a property interest that entails the right of overflight in the airspace above or in the vicinity of a particular parcel of lot of real property. It also includes the right to create such noise or other effects as may result from the lawful operation of aircraft in such airspace, absent any limitations or exceptions set forth in the terms of the easement, and the right to remove any obstructions to such overflight. Hence, an avigation easement generally would authorize aircraft approaching an airport or landing strip like OLFC, to fly at low elevations above private property.

Regardless of whether the Navy wants anyone to know about Navy use of avigation easements on Whidbey Island in connection with overflights of private residences at low altitudes in the performance of some level of FCLP operations, the Navy has acquired by the payment of U.S. dollars avigation easements in regard to some number of lots or parcels in Admirals Cove and in property adjacent or close to OLFC. Further, in lawsuits in Federal Courts, the Navy has asserted in multiple cases that it acquired a prescriptive avigation easement by virtue of having flown over private property for considerable lengths of time, and asserted that prescriptive right as a defense in a "takings" lawsuit.

Nonetheless, in Argent v. United States, 124F.3d 1277 (1999), the court acknowledged that changing circumstances, such as faster and noisier aircraft (for example, the EA-18G Growler has both a noisier profile than the Prowler and also emits a low-frequency sound that is more dangerous than the higher frequency emitted by the Prowler; and of course recall that the DEIS is proposing up to 35,100 FCLP operations, a 575 percent increase from the current levels of 6,100), may effect a second, different "taking". While the Navy actually flew more than 6,100 FCLP operations, that excess was the basis of a federal court enjoining the Navy from continuing to perform more than 6,100 FCLP operations per year. The point here is that there likely will be held to be a new "taking" if the FCLP operations are increased in fact to more than 6,100, especially given the Navy's actions relating to establishing the limit of 6,100.

Under state law, an interest in real property is required to be recorded, so as to provide subsequent owners with a basis to be informed of the existence of any encumbrance, lien, easement, or other interest that could affect a new owner's plans for using the property.

It is interesting to note that multiple trips to the Island County Recorder's Office as well as to the Federal District Courthouse in Seattle failed to turn up a single instance of the recordation of an Avigation Easement of the Navy. I became interested in this regard when I was assisting a friend in the purchase of a 26-acre parcel of undeveloped land that is adjacent to the lot upon which my home was constructed following purchase of the lot in 2001. My friend made an offer that was accepted, and he received a Preliminary Policy of Title Insurance that indicated easements, but no Avigation or other Easement owned or held by the Navy. While my friend ultimately decided against consummating the purchase, that property ultimately was purchased by another person who later became a friend. Recently, my wife asked the new owner whether his Title Insurance Policy contained any acknowledgement of the existence of any Avigation or other Easement in favor of the Navy. This inquiry was made subsequent to finding the whereabouts of the prior owner and he presently is living in Florida. He refused to discuss any aspect of an Avigation Easement. Because we also had obtained a copy of numerous Avigation

Easements, including one signed by the guy in Florida (but who formerly lived and worked in Seattle), his refusal piqued my level of interest, which led to finding a bunch of other Avigation Easements and documentary evidence. Including learning that a sum of \$750,000 was paid by the United States Navy for a group of those easements. One in particular was to a person who lives near Coupeville. My diplomatic wife went to visit the gentleman in his shop and his reaction was similar to the reaction of a movie actor who is afraid of the mafia. No kidding. He quickly said he could not and would not discuss such a matter with anyone, ever. End of that discussion.

To me, the reaction of both gentlemen suggests that both have signed Nondisclosure Agreements containing some form of penalty for disclosure in violation of the nondisclosure provision. Or is there another explanation. Well, certainly, no disclosure publicly has been made by the Navy.

There is also some evidence that a representative of the Navy denied in an email the existence of a known Avigation Easement, but that might simply be explained in terms of that person not knowing what she was doing or where to find an accurate answer. On the other hand, maybe she was absolutely correct.

Nonetheless, I find it impossible to accept the distinct possibility that the Navy is hiding something here. I am hereby asking Navy Leadership to divulge publicly both the existence of all Avigation Easements they have acquired by purchase or by prescription, the price paid, and the parcel and street address of all such property situated in Island County Washington. That information does not involve any secrets affecting national security, and could be obtained through the Federal Freedom of Information Act. But it is disconcerting that the Navy paid money for an easement that is a legal interest (indeed, it is an encumbrance upon the property subject to it) as to property, including property owned by a friend who is a lifelong resident on Whidbey Island and a contractor/developer. By not recording it, the Navy deprived my friend, the current owner of the property, that the property was subject to the easement. That likely would have affected the purchase price, or at least his offer. If the Navy had recorded the easement, it would have been set forth in the Title Insurance Policy, the same as all the other encumbrances. Although in some judicial proceedings, the Navy likely could be precluded by a court from asserting its rights under the easement. In terms of the laws relating to "Equity" the Navy cannot benefit from having "dirty hands." I wonder what the CINC of the Navy would have to say about this. At best, it is unseemly, to me.

That isn't the end of the Avigation Easement saga. It gets worse and worse.

Why would the Navy pay some residents for an Avigation Easement and essentially hide it from others? Why would the Navy treat some civilian residents different from the way it treats others? That is a confounding and troubling scenario that should be investigated by the Armed Services Committee of the United States Senate and by the Oversight Committee of the House of Representatives of the United States. Is it unique, or is it the norm? To me, it is a power that should be reined in a bit.

Also, it is troubling to me that the United States Navy would assert as a defense in any trial involving American Citizens in which an unlawful "taking" by the Navy is alleged. The reason it would be alleged is twofold: (1) It would negate the recovery for any claim for a "taking" if the "taking" occurred more than six years prior to the alleged date of the taking, and (2) it would negate the claim if the "taking" occurred less than six years ago and the allegations refer only to acts that are clearly authorized by the terms of the easement (for example if overflights higher

than say 1,000 are permitted under the easement and the Plaintiff could not prove there have been any flights less than 1,000 feet). In my view, it is or should be against public policy (maybe it already is) for the Navy to use technical defenses against Citizens of the United States. The Navy should be held to a higher standard so as to be forced to treat all Citizens equally, even if it is not so inclined.

In the context of "takings" cases, the United States Constitution prohibits the taking of private property for public use without just compensation, and declares that no person shall be deprived of property without Due Process of Law (Fifth Amendment, United States Constitution). Cases of the United States Supreme Court, in regard to the necessity of Due Process, have imposed certain substantive and procedural requirements before any deprivation of property is imposed. While a statute of limitations serves the public policy of requiring actions for remedies to be initiated prior to the expiration of a prescribed period of time (for example, a 3-year period of time in which to seek a judicial remedy for a breach of contract, which serves as a reasonable period of time after which the uncertainty of having a possible lawsuit for an unlimited period of time, as well as avoiding the shadow of uncertainty as to the enforceability of contracts upon conduct of commerce) is outweighed by the need for certainty to prevail in contractual disputes. The nature of that policy does not apply to a complex situation involving thousands of lots and homes in the vicinity of OLFC, especially where the Navy has apparently been hiding the fact of Avigation Easements and its selective use of taxpayer dollars to purchase a few such easements, quietly.

Maybe I expect too much from the Navy, but they should do better than their past record suggests. Perhaps, the best solution will be to seek an Amendment to some appropriations bill for Navy expenditures to extend the right to sue the Navy for a "taking" of real property, within the protections of the Fifth Amendment to the United States Constitution, for 50 years, and to negate any prior use of a statute of limitations in "taking" by Aircraft noise cases already concluded. Citizens of the United States deserve to be, and should be, treated reasonably by the Navy.

It is worth noting that the assertion of an affirmative defense in any case, including a defense based upon the expiration of a period of time set forth in a statute of limitations, doesn't mean the underlying cause of action isn't valid or worthy. It merely means that the sought after remedy is no longer available, but only if the statute of limitations is asserted as a defense. If it is not asserted, the trial will continue. In part, the assertion by the Navy of a statute of limitations in a case involving an alleged "taking" in violation of the Fifth Amendment in the context of FCLP operations at OLFC, where it is shown that the Navy has dirtied it's hands by hiding the existence of easements would be to reward the Navy for bad behavior that flies in the face of the mandates and requirements of NEPA. In other words, it would seem to me to violate a basic consideration of knowing the difference between right and wrong.

SECTION 15.

NOISE ABATEMENT

The DEIS includes what is no doubt a long-standing policy statement regarding training and operational flights over local communities, including the numerous distinct neighborhoods that literally surround OLF. That policy statement, which is repeated several times in the DEIS, reads as follows: “It is Commanding Officer, NAS Whidbey Island policy to conduct required training and operational flights with as minimal impact as possible, including noise, on surrounding communities. All aircrews using” . . . [various Navy facilities, including OLF] “are responsible for the safe conduct of their mission while complying with published course rules, established noise-abatement procedures, and good common sense. Each aircrew must be familiar with the noise profiles of its aircraft and is expected to minimize noise impacts without compromising operational and safety requirements.” (see, for example, Sec. 4.2.5, Vol. 1., DEIS). Specific noise-abatement procedures and policy are outlined in Section 3.2. Similar or identical statements of the Commanding Officer, NAS Whidbey, are included in several other areas of the overwhelmingly large DEIS. If there exists a Navy policy to provide an enormous amount of information in a repetitive fashion for each of the **10 different scenarios**, then the DEIS is an overwhelming success. But I digress.

Section 4.2.5 reflects the same policy in considering each of the three Scenarios under Alternative 1, and clarifies what is NAS Whidbey Island, by expressly indicating that the “noise Abatement Policy applies to all aircrews using Ault Field, OLF Coupeville, Naval Weapons System Training Facility Boardman, and the numerous northwest instrument and visual training routes (IR/VR) throughout the Pacific Northwest. Additionally, the policy states that “aircrews are directed, to the maximum extent practicable, to employ prudent airmanship techniques to reduce aircraft noise impacts. Examples of noise-abatement procedures in the NAS Whidbey Island Air Operations Manual (NASWHIDBEYINST 3710.7Z, dated March 9, 2015, include all of the following:

- Aircrews shall, to the maximum extent possible, employ prudent airmanship techniques to reduce aircraft noise impacts and to avoid noise-sensitive areas except when being vectored by radar ATC or specifically directed by the control tower.
- Sunday Operations: From 7:30 a.m. to noon local on Sundays, noise-abatement procedures require arrivals, except scheduled FCLP/CCA aircraft, VR-61 drilling reservists, and VP-69 drilling reservists, to make full-stop landings.
- Due to noise-abatement procedures, high-power turn-ups should not be conducted prior to noon on Sundays or between the hours of 10:00 p.m. to 7:30 a.m. for jets and midnight to 7:30 a.m. for turboprops. For specific operational necessity requirements, defined as preparation for missions other than routine local training and functional check flights terminating at NAS Whidbey Island, high-power turn-ups may be authorized outside these established hours.
- Wind component and traffic permitting, morning departures prior to 8:00 a.m. shall use Runway 25, and evening arrivals after 10:00 p.m. shall use Runway 7 to maximize flight over open water.
- Make smooth power changes. Large, abrupt changes in power result in large, abrupt changes in sound level on the ground.
- The maximum number of aircraft in the FCLP flight pattern is five. This is so the FCLP pattern stays within the 5-mile radius of the class “Charlie” airspace, aircraft do not get extended creating additional noise impacts, and allowances may be made for non-FCLP aircraft to operate concurrently.

- Avoiding noise-sensitive and wilderness areas by flying at altitudes of no less than 3,000 feet AGL except when in compliance with an approved traffic or approach pattern, military training route, or within Special Use Airspace.”

That is a lengthy quotation, but it is worthwhile to understand that there are written directives. Nonetheless, there have existed Growler and Prowler Pilots who adhere to all of those directives and a few that do not. This perception has existed for the entirety of my time spent on Whidbey Island during the past 14 years. And Whidbey is my only place of domicile. I reside on Whidbey year-round and am absent only for vacations or family visits. In other words, it is one thing to have directives and it is quite another to enforce those directives. I have no information regarding enforcement, but believe that in my 14 years of living on Whidbey in the same home, and likely spending more time outdoors and in my backyard doing construction, maintenance and one heckuva lot of gardening than anyone I know, I have accumulated knowledge about pilot idiosyncrasies and predilections. For example what young man wouldn't like to fly like a wild man or test his or Growler limits? I acknowledge that there are not many occasions to do so because piloting even a Whidbey-based Growler is subject to the inherent directives involved in flying in closed loops in a safe and sane manner. However, there are gaps in the inherent controls on pilot behavior. For example, most of the pilots who exit from a closed loop pattern at OLFC and fly on a heading back toward Ault Field, attain a safe altitude before they cross the coast line of Penn Cove (when Runway 32 is used), and throttle back until well out over the waters of Penn Cove and only then execute a right turn over the water and proceed around Strawberry Point and onward somewhere eventually out of my sight, landing at Ault Field. Those nice guy pilots also fly a heading that represents a continuation of the center-line-extended of OLFC, until well out over the waters of Penn Cove. Then there are the other pilots. The ones who sometimes seem hell bent upon catching up with the aircraft ahead of him/her and first fly a heading 10-25 degrees to the right from the center line extended of OLFC, then execute first a sharp left turn to avoid a stand of tall Douglas Firs between Parker Road and the water line of Penn Cove, and then quickly execute another right turn sometimes flying with the wings on the Growler at a position that is perpendicular to the ground and at an increased ground speed well in excess of 250 knots and at an altitude that seems not to be more than 350 feet. That kind of flying was the subject of a conversation between [REDACTED] my wife, and the duty Officer at OLFC several years ago when you could reach a person in [REDACTED] of a machine in regard to excessive noise involving excessive piloting. That Officer called back a day or two later and confirmed that he had figured out the culprit, because we had given him the precise time that the wings-perpendicular mode of flying occurred over our home located to the north by northwest of runway 14. He also said he had discussed the matter with that pilot and said that it would not happen again. It didn't, for a couple of months. Then, maybe a new crop of pilots showed up.

That type of flying also seems to be the subject of a manual devoted to the do's and don'ts of piloting contained in OPNAVINST 3710.7U. In regard to Flight-related disturbances, the Regulation at 5.5.1 reads:

“Annoyance to Civilians and Endangering Private Property. Flights of naval aircraft shall be conducted so that a minimum of annoyance is experienced by persons on the ground. [Ahem - please read that again] It is not enough for the pilot to be satisfied that no person is actually endangered. Definite and particular effort shall be taken to fly in such a manner that individuals do not believe they or their property are endangered (I guess that should be read as “reasonable” individuals?). The following specific restrictions apply in view of the particularly unfavorable effect of the fear, extreme annoyance, and damage that can be inflicted. . . .”

“5.5.1.6 Flat Hatting Flat hatting or any maneuvers conducted at low altitude and /or a high rate of speed for thrill purpose over land or water are prohibited. Any act conducted for thrill purpose are strictly prohibited.”

became aware that a new Commander had been installed at NAS Whidbey, we perceived a reduction in the frequency of over-the-line piloting, but acknowledge that deployments may well change the nature of the unnecessary noise scene. There likely will always be a few that seem to take delight in flying differently and generating more noise than the gentlemen. I even have a visual of Sen. John McCain, who we all know was, at a minimum, a very aggressive pilot, in addition to his being a National Hero and a Great American. Aggressive piloting likely was/is in his blood. And he always has been a Great American.

At the scoping meeting in Coupeville, we also specifically asked [REDACTED] why it was no longer possible to reach a live person when we had an issue we w [REDACTED] discuss. I don't know when the new policy of only being able to reach a recording machine in lieu of a real person was implemented. His response was that we wouldn't believe some of the abuse and language employed by some people in making complaints or reporting particular incidents. Not being able to reach a real person lessens the likelihood that a real problem might be resolved with timely input from civilians, like us. He said the new policy was introduced to insulate the Navy's personnel who were monitoring live reporting. But it goes far beyond that. I agree that abuse likely is a huge issue coming from some folks who live near OLFC. Indeed, I invoked 5 full years of silence upon my next door neighbor in lieu of attempting to communicate with that neighbor. But I didn't cut off communicating with anyone else. I would support a three strikes of abuse (maybe two would be best) and you are thereafter barred kind of system, instead. The Navy could place a block on any calls from any telephone number they choose. In essence, I don't think eliminating the possibility of resolving some issues that may depend upon timely input is the best policy that could be employed. My personal experience is but one example. Finally, if you call the complaint line and leave a message, the return call may arrive when the complainer isn't available. That happened to [REDACTED] twice over time. Although [REDACTED] then returned the return call, but the person ([REDACTED] was not available) never [REDACTED] ed back. We could do better, I think.

Complaints about excessive piloting behavior of Navy personnel, in my opinion, are worthy of listening to in a timely manner. The present level of the lack of an opportunity for timely communications would seem to me to be an undesirable thing to the Navy, especially when there is so much hostility on both sides of the noise issues arising from FCLP operations at OLFC. It would also reduce the likelihood that a "problem" pilot could be identified and issued stern warnings about "flat hatting."

SECTION 16.**THE NAVY, NEPA, AND
PREDICTABLE FINDINGS OF “NO SIGNIFICANT IMPACT”**

In performing research, preliminary to drafting these comments, I discovered dozens of instances in which the United States Navy has prepared and put into the “public domain” Draft Environmental Impact Statements” (hereafter DEIS) for various “projects” involving widely differing aspects of Naval duties and missions. Most involved new equipment or additional equipment assigned to various Navy bases.

I am dismayed by my inability to find a single instance in which the Navy, notwithstanding the advent of bigger, stronger, faster, louder equipment, has ever reached a finding that its proposal for aircraft or equipment would have anything other than “No Significant Impact.” My dismay may be misplaced by not looking long enough. Also, my dismay may best be directed toward the entire EIS process, rather than the Navy in particular. To me, the EIS process invites investigation and perhaps a legislative revamping of the process required to adopt, implement, and deploy new equipment that affects or has the potential to affect civilians and military personnel regardless of where they reside. Why? First, in the context of a Navy DEIS, the Navy performs the task of coming up with “data” that often is created in a manner that understates or avoids analysis of the essential issues. The Navy has been accorded “great discretion” in selecting the metrics to be used in the DEIS. It is apparent that their metric selection skills leave much to be desired, if accurate and objective portrayals of “facts” are considered important. If not, then the current system is a facade and virtually worthless, in my opinion. After selecting the metrics and providing the data for analysis by experts hired by the Navy, the Navy makes a finding of “No Significant Impact,” thereby avoiding the necessity to do any further environmental work.

Worse, in prior years, as in replacing the predecessor Prowler with the Growler, the Navy declared that the Growler is “quieter” than the Prowler (in many respects it is not). In prior years, the DNL numbers for the Prowler were at a lower level than in years earlier and no explanation is given. Since DNL’s were based upon computer projections, using data provided by the Navy, it is disconcerting at best that the same software and same “experts” came up with new projections that assisted the Navy in making the argument that the Growler isn’t bad, it’s quieter than the Prowler. Or, perhaps, the Navy unilaterally fed new “data” to the computer program. Now, in the current iteration of a DEIS, the Navy is attempting to increase the number of FCLP operations to be conducted at the combination of NAS Whidbey and OLFC from 20,800 operations per year to as many as 43,900 per year, and showing a transparent preference for the alternative and scenario that would increase the Growler operations per year at OLFC from 6,100 to 35,100. And it has greased the skids for a “No Significant Impact,” as if that would be a fully objective conclusion. In fact, it clearly has nothing to do with objectivity. In my opinion, it is little more than merely a way around the obstacle that is NEPA and the EPA. It apparently even permits the vital

Tourist element of Coupeville's economy not even to be mentioned in the DEIS in the context of Coupeville's obvious economic reliance upon Tourism, notwithstanding that an increase in FCLP operations of anywhere close to 575 percent, as per Scenarios A, B, or C, of Alternative 1, 2, or 3, may well sound the death knell to Tourism anywhere within earshot of Coupeville.

Personally, I expected more integrity, forthrightness, and accountability from and within the Navy that is duty bound to protect both the United States of America and **all** of its citizens, including those who live in Coupeville or its Environs. It is tantamount to a Declaration of a War by Noise Terror upon the Civilians who live below the flight paths of the FCLP's performed at OLFC. It is a Declaration that the lives of people living below those flight paths don't matter. It is a Declaration that results from Navy logic that Trumpets The Mantra that the OLFC is the best landing field for these insane numbers of FCLP's. That is only because the Navy refuses, unreasonably, to consider any alternative FCLP sites.

The Navy and the United States Government own thousands of acres of land in the Pacific Northwest, indeed across the western portion of the United States. If the Navy was practicing dropping new versions of deep digging bombs or hypersonic missiles, would they say an area in which local governments have permitted civilian residential development to encroach close to the primary Navy base for testing new explosive devices is the best site to drop deadly new weaponry? I wonder. The obvious answer is that a new site should be secured for FCLP operations away from any population of civilians or military personnel. In the DEIS, the Navy only goes through the typical motions it has undertaken in countless other instances requiring the drafting of an EIS of considering the impacts upon people and the environment. It even hired outside contractors to conduct studies, using computer-generated data in lieu of real and actual and accurate data, to "prove" the absence of significant impact. The DEIS is a facade.

But the Navy does not ever say that there never will be people whose hearing will suffer, whose blood pressure won't reach dangerous levels, whose children will not suffer health-related impacts upon their education or learning abilities, whose fetuses will not suffer unknown disease or disability caused by extraordinary bursts of noise approaching or exceeding 125 decibels, that low-level sound waves generated by Growler engines won't have any impact on the fragile bluffs of Whidbey Island, or that existing home values will not continue to be adversely affected in the vicinity of OLFC. All of which actually may become reality in the lives of Civilians. Neither will the Navy aver or assert that there has never been an instance in which the Electronic Warfare equipment of EA-6B or EA-18G Prowlers or Growlers was used against civilians who reside on Whidbey Island below flight paths of those aircraft, including me (see Section 6. [Electronic Warfare against Civilians?](#), My Comments)

In essence, the EIS involves a process that absolutely allows the Navy to pick the information it chooses to present, allows the Navy to judge which of the several alternatives, if any, should be selected, adopted, and implemented, and doesn't even preclude the Navy from making its "findings" before the expiration of the period of time

allotted for public comments, which may not even have to be read, especially by an independent panel, and allows the Navy to then announce its selection of whichever alternative it favors, and allows the Navy to determine whether there will be any significant impact. It is laughable, but extremely sad, to say that the process is designed to reach an objective decision, given the number of EIS's in the Navy history that "determined" the absence of any significant impact. It is also laughable that the DEIS actually contains 10 different proposals, each a separate Alternative or Scenario and gives the public an opportunity for public comment; and provides for the OLFC area one copy of the DEIS for public use inside the Coupeville Library (after nearly one thousand residents showed up for the public scoping meeting in Coupeville in December 2016), in addition to several other copies placed in out of town communities, like Guemes, Orcas, and Lopez Island, and Sequim and on and on. The result is that you can read the DEIS online. It is very difficult to read it online and refer back to the Tables, Figures, and maps. It is two large volumes, over a dozen different sub-sections and appendices, and many more dozens of charts, figures, and tables, sometimes referred to but difficult to find quickly. I had no time to count, but I have read somewhere that it is something like 1500 pages. Thanks, United States Navy. I got the message.

The process is flawed terribly, as it is administered in a way unintended by Congress. Congress assumed that the dictates of fairness and even-handedness, indeed objectivity, would prevail, and that equal consideration would be given to civilians impacted by Navy proposals. In my opinion that has not happened, and isn't even close to happening, with this flawed DEIS.

SECTION 17.

“ISSUES” OF NAVY LEADERSHIP AND ACCOUNTABILITY

The sheer number of scandals across the United States military services raises serious questions and issues about leadership and accountability in the various military service.

The current Navy-related scandals include the “Fat Leonard” bribery scandal that has resulted in the termination of the Navy careers of at least 3 Admirals and numerous other Officers. In 2016, an additional Admiral pleaded guilty to making a false statement to a federal investigator regarding the “Fat Leonard” bribery scandal. Two of the three Admirals first mentioned above were given letters of censure and were determined to have demonstrated poor judgment and a failure of leadership by engaging in unethical conduct., and the other was demoted.

A Marine Corp. General, in the context of the need for leadership and accountability has stated that “We will still need men and women in uniform to call things as they see them and tell their subordinates and their superiors alike what they need to hear, not what they want to hear.” . . . “The time will come when you must stand alone in making a difficult, unpopular decision, or when you must challenge the opinion of superiors” . . . “[and] there will be moments when your entire career is at risk.” *Sprinting Through The Tape*, Major General Thomas L. Wilkerson, U. S. Marine Corps (Ret.), Proceedings Magazine, July 2008, Vol. 134/7/1,265.

The difficulty of taking a strong stand when your career is at risk is generously presented by the court-martial case of one [REDACTED]. That case resulted from the death of a Petty Officer during small-boat operations on May 4, 2009, in the Gulf of Aden. An accident had occurred that involved 3 crew members in an inflatable boat that unfortunately flipped while being lowered into the sea. [REDACTED] was the Executive Officer of the USS San Antonio at the time, and was charged [REDACTED] for failing to properly train and supervise small-boat operations. [REDACTED] chose to take his case to a court-martial in lieu of accepting a reprimand as had [REDACTED] given and accepted by the ship’s captain. When asked why he refused administrative punishment, [REDACTED] said: “Things needed to be made known. . . .Someone needed to stand up.”

The two sides in the court-martial case took very different positions. The prosecution’s position was that, regardless of circumstances, officers are responsible for the crew under their command. The defense argued that circumstances do matter and that, at some point, a Navy effort must extend beyond the confines of a single ship. The prosecution had not touched on the point that major material problems had plagued the USS San Antonio. Essentially, the ship had less than 100% of the resources necessary to accomplish its mission safely, but, nonetheless the Captain and Executive Officer were being held by the Navy to a standard that rendered irrelevant those limiting circumstances. [REDACTED] was determined not to be responsible for the sailor’s death.

Following that acquittal, Four-Star Admiral John C. Harvey penned a message declaring that, in the future, officers and executive officers need not fear becoming a scapegoat when things go awry, but neither can you claim that less-than-ideal circumstances will absolve you of responsibility. “The absolute responsibility that you have is the Navy’s greatest strength because it gives you the ability to command. And with that responsibility comes the accountability that ensures command is worth something, and worthy of those we lead.” (USNI Foundation, Leadership and Accountability, Nov. 2010).

How does this discussion have application to the DEIS for EA-18G Operations at NAS Whidbey and Whidbey OLF? The DEIS has an enormous amount of information that, if accepted or approved, or both, will become tantamount to “facts” that likely will be looked at and essentially cited as factual by federal and other courts of law. In a letter, dated November 8, 2011, and written by the then Chief of Naval Operations, Admiral Jonathon W. Greenert stated that “Command is the foundation upon which our Navy rests.” “Authority, responsibility, and accountability are three essential principles which are the heart and soul of Command,” and that “you will be held accountable to the highest standards of personal and professional conduct.” It is my position that information in the DEIS is sordidly lacking in integrity and accuracy, and that even as a draft, it is not worthy of being representative of a document ready to be submitted to the general public, specifically the people of Whidbey Island, because it is not consistent with the above-referenced principles of command responsibility. It is a one-sided Navy document in support of what the Navy wants to do at OLFC and Ault Field, in terms of FCLP’s and little if any consideration is given to the requirements of NEPA and the Constitution of the United States (see Section 1, NEPA: The Federal National Environmental Policy Act of 1969 and the United States Navy, My Comments). Further, it is my opinion that the DEIS, in its entirety, should be withdrawn, thrown in the proverbial “can,” and reorganized and rewritten. Simply stated, in my opinion, the DEIS is beneath the dignity and expected performance of people who have been given the honor of command within the United States Navy.

In this regard, consider the Navy “flavor” expressed in the DEIS, in the light of [REDACTED] Declaration made under penalty of perjury and submitted in Case No. [REDACTED] 32- filed May 29, 2015 in the United States District Court for the Western District of Washington at Seattle states as follows: “The population surrounding Ault Field is greater than that surrounding OLF Coupeville, which means noise impacts from aircraft operations at Ault Field impact a greater number of people than at Coupeville.” [The “2” is a reference to a footnote]. Footnote 2, accompanying that quote is another quote which reads as follows: “2 Populations data shows that in 2010, Coupeville, Washington populations was 1,831 and Oak harbor Washington population was 22,075.”

While I am not accusing [REDACTED] of perjury (he may not have written the document or even read it), in my opinion [REDACTED] is at variance with the facts. First, the City of Oak Harbor is adjacent to Ault Field, but Coupeville is not adjacent to OLFC. Second, the contour lines for the “No Action Proposal” of the DEIS (meaning existing levels of flights) do not extend to include all of Oak Harbor, so it is misleading or deceptive to infer that all of the population of Oak Harbor is impacted by Ault Field flights. Indeed, runway 32 at Ault Field is seldom used and generally not used for FCLP’s. That is the runway closest to the Oak Harbor neighborhoods having the highest levels of density. None of the 4 Ault Field runways entail flying directly over the most populated neighborhoods of Oak harbor. In contrast, the population surrounding OLFC includes more people than live within Coupeville city limits. While Coupeville is at least 3 miles from OLFC, there is, for example, the community of Admirals Cove, which is several more than 3 miles from Coupeville’s City Limits and consists of over 400 homes and geographically is at the southern end of runway 32 at OLFC, as well as hundreds of other homes that lie within even the 65dB contours drawn for OLFC. Admirals Drive and Byrd Drive, which is in Admiral’s Cove, is the location of the POI near OLFC that has a DNL of 79 as projected in the DEIS near the end/beginning of runway 32. The POI having the highest DNL around Ault Field is for the POI of Sullivan Road. An online check of Sullivan Road reveals that there are 3 (three) registered voters who live on Sullivan Road (!). Third, the FCLP flight tracks drawn for Ault field primarily utilize runways 07 and 25, and seldom use runway 14 of 32, which [REDACTED] could have said means that FCLPs seldom invade the city limits of Oak Harbor and [REDACTED] burden Oak Harbor residents to the same degree or extent as the people for example who live in Admirals Cove, because distance decreases dB levels. If you examine closely the topographical maps for the areas surrounding OLFC and Ault Field, you will see that the area directly below flight paths for OLFC are generally over more densely

populated areas than is the case for the people living below flight paths at Ault Field. Moreover, if you re-visit the topographical maps, there are few houses between the end of runway 25 and Dugualla Bay or between the coastline and runway 07 where I am able to detect zero homes. Contrasted with Admirals Cove or even my home on Kineth Point, there is a difference. Oh, also, my home is not within the City Limits of Coupeville. Neither is my neighborhood, the neighborhoods around Race Lagoon, Harrington Lagoon, the neighborhoods near and Snakelum Point and Long Point, and on down Parker Road nearly a mile to a sign greeting us with "Coupeville City Limits."

My only point is that there is a lot of evidence that suggests that the DEIS is not an objective document. It is intended to support the Navy's conclusions, as made in the past, that OLFC, not Ault Field, is worthy of more intolerable, damaging Growler-induced noise. And the words, "the Navy cares" ring hollow and on deafening ears.

There are other areas concerning operations that cry out for attention by Navy leadership. In my 14 years of full-time residence on Whidbey Island, and spending literally thousands of hours in my rather large and very nice Garden, and being a person who is observant by nature, I have become knowledgeable of idiosyncrasies and techniques of Prowler and now Growler Pilots and Crews, performance variables between Pilots, and the evolution of the meaning of the phrase "we want to have a dialog" which I cynically believe is intended for someone other than citizens of Whidbey Island who live in the vicinity of OLFC.

Let me contrast two or more different kinds of techniques utilized by Growler Pilots over OLFC. Upon executing a takeoff after a touch, when on the way back to NAS Whidbey for more fuel or food or rest, most Pilots stay on a course that is the extension of a straight line from the touchdown point at OLFC that is clearly parallel to the straight line created by the runway. Those Pilots apply lots of throttle until a safe altitude is attained (which normally occurs about ¼ to ½ mile prior to reaching the water line of the east side of Penn Cove (facing Ault Field and Oak Harbor). Once a safe altitude is attained, those Pilots throttle back for a mile or so (seemingly to reduce noise below) and then, over the waters of Penn Cove, throttle up as they begin to turn in an easterly direction over the water and ultimately turn left over water toward Dugualla Bay or somewhere close to begin the approach to land at Ault Field. [REDACTED] and I call those Pilots the nice guys.

Other Pilots deviate considerably from the straight line mentioned above, shortly after take off after a touch, execute a right turn of about 10-25 degrees to the east of runway 14 and then execute a left turn and then another right turn before getting to the waters of Penn Cove. Sometimes, the last two turns allow them to fly like proverbial Bats out of Hell. One of the few complaints we have made in 14 years was about a pilot who made those three turns after take-off and flew directly overhead my home with both wings perpendicular to the ground, and of course, throttled back only after he was 2 or so miles out and over Penn Cove. We call those kinds of Pilots the Pilots who fly their planes as if it was the last opportunity for a joy ride. I get the fact that it must be an enormous thrill to fly an EA-18G right to the absolute maximum or a little beyond, but it should not be up to me to say so. On that particular occasion, we actually could reach a public affairs person and on that occasion [REDACTED] actually spoke to the a person who identified himself to [REDACTED] as "Officer [REDACTED]." She did [REDACTED] have to remember it, as she wrote it down and saved her notes. She had no [REDACTED] precise time of that unnecessary maneuver and passed it along to Officer [REDACTED]. He actually called back a day later and indicated that he had figured out from the logs who [REDACTED] was the culprit, and that it would never happen again. It didn't happen again soon, but it has happened on a number of other occasions. Perhaps, that could be explained by a change of Commanders or new crews arriving at NAS Whidbey. I have no clue. However, I have been around enough aircraft that I can tell excessive, unnecessarily aggressive, or nearly reckless piloting at low altitudes from normal piloting.

In our experience of watching and monitoring FCLP's for 14 years from our Garden which is on waterfront property on the East side of Penn Code, [REDACTED] and I agree that most pilots fly basically the same track, but there are a few that do [REDACTED]. They prefer a longer track, or so it appears to us, to enable them to fly at a faster speed to seemingly make more noise than the others. Moreover, once the Pilots leave the confines of the OLFC closed loop flight paths and fly back to NAS Whidbey for fuel, food or rest, it is during the flights away from OLFC that some Pilots have fun flying Growlers in ways that seem not to be friendly to those of us who have no choice but to endure the "added" or "extra" noise, but rather oblivious people living below. That is a problem that, in our view, clearly demands attention and remedial action if not discipline. To us, it is unacceptable. It is our intention to begin keeping detailed information of Pilot activities when they occur, and to draw it to the attention of a Navy Commander, somewhere.

Another matter that, in our opinion is ripe for review and perhaps revision is as to flight tracks out of NAS Whidbey for EA-18G's that leave NAS Whidbey for other locations to undertake other, various forms of training and practice. It is a given that, if FCLP operations are undertaken at OLFC, some EA-18G's are going to come close by and make tremendous noise. It is less understandable why, when EA-18G's depart Ault Field for a flight out of the area of NAS Whidbey, such as flying over to Boardman, they mostly are directed by Whidbey Approach to fly directly over OLFC and the same houses burdened by the FCLP operations. Why cannot those departure and arrival flight paths or flight tracks be redrawn to avoid flying over the same homes. For example, many of the flights take the aircraft over or near Dugualla Bay after departure from NAS Whidbey and so the question arises, at least in my mind, why cannot a vector be established keeping the aircraft over the Saratoga Passageway at least until they reach a point that would intersect the line currently used that directs the aircraft to fly over OLFC. That difference is a difference of only 10-20 miles, but it would nearly silence one of the unnecessary sources of loud noise over the homes of people both to the north and to the south of OLFC. Isn't that a legitimate goal here? Can't we work to resolve some of the noise issues? How much measurable noise do these departure and arrival flight tracks generate, as for example, when they are ascending at full throttle or even with the assist of an after-burner?

I understand that flight tracks sometimes are negotiated between the Navy and the FAA, but we are not talking about major revisions. Just a little consideration for Civilians already burdened by FCLP noise, and favored by the Navy to have that FCLP noise increased by 575 percent.

Similarly, often the flight paths of planes descending on approach to NAS Whidbey take the planes directly overhead at altitudes of approximately 3-5,000 feet, and those too raise the question of why over the same houses already burdened with FCLP noise. I hope the Commander NAS Whidbey will undertake the task of reviewing and ultimately revising these flight patterns, consistent with an active, effective noise abatement program.

While I have not yet measured the noise generated (I promised myself to purchase a top-rated I-Phone application along with an omnidirectional microphone and tripod stand that will accurately measure decibel levels), by the flight patterns of EA-18Gs discussed in the previous two paragraphs, it is true that for some departures there are two, three or four EA-18G's grouped in a formation 30-45 seconds or so before arriving over my home. My estimation is that the noise event with three aircraft in a V-formation would approach 100 dB, even at an altitude of 1,000 to 3,000 feet. In other words, it is noisy noisy and some of that noise could be eliminated, minimized, or otherwise dealt with, if there is the will to do so on the part of the Navy.

Another area in which the Navy has made an impact is in regard to the ability of Civilians to make timely input and engage in a dialog with those various Navy personnel. When [REDACTED] and I first arrived on Whidbey Island in 2002, we made no phone calls and sent no emails o [REDACTED] ters

of any kind. We had zero contact. There was noise, but it was not unbearable. When we first began to notice what we considered to be extraordinary differences in Piloting, we contacted the Navy, as indicated above in the discussion about Pilots that have excessive flying tendencies. [REDACTED] the diplomat, made our point, received assurances that the matter would be handled and [REDACTED] were thankful for the opportunity to assist in the resolution of a “growing” problem. Fast forward a few years to the present. We can still call the “hotline” or the “complaint” line, but are fully unable to talk to anything other than a machine. Usually, the machine doesn’t call back. At the public scoping meeting, this was a matter brought to the attention of [REDACTED] and a couple of the other Officers present and each was adamant in defense of [REDACTED] system. So much for having a dialog. One Officer defended the current system on the basis that the person or persons who formerly answered the phone took horrible abuse with inexcusable language, and that those persons needed to be insulated from the abuse. So, if I understand this correctly, it is the position of Commander NAS Whidbey that all the citizens of Whidbey Island (probably most of whom live in the vicinity of the OLF) are denied use of real-time “dialog” in order to insulate a person or two from taking phone calls and dealing directly with people who are verbally abusive. Moreover, the “abuse” is not a one-sided argument. Consider “abuse” from the perspective of a person living beneath a Growler being flown by a Pilot who doesn’t care, or with a crewmate who repeatedly destroys civilian electronic equipment (see Section 5, Electronic Warfare Against one Citizen?, My Comments).

Here are examples we encountered, using the present system. We found a quotation in the December 23, 2013, edition of the Seattle Times that we wanted to use in the preparation of our comments regarding the DEIS. The article, however, is on the Internet and there is no source information included. Because the quotation was of a Navy spokesperson, we contacted the Community Planning Liaison person at NAS Whidbey, [REDACTED] by phone and actually talked to her and asked if she would determine the identity of the source. She replied by email, which reads: “This link will take you to the document. <http://whidbeyeis.com/CurrentEISDocuments.aspx>.” That, sadly, is a direction to look at the Title Page of the entire DEIS pending before the public. Isn’t that a 1,500 page document? In any event, the quotation could not be found in the document to which Mr. [REDACTED] referred us to. Three days later, on December 16, [REDACTED] called, talked to The Machine, and asked for a more exact reference, based on the suspicion that [REDACTED] must have located the source of the quotation (otherwise she would not have referred us to a 1,500 page document) but neglected to give us the exact location within the [REDACTED] S.

Following that, [REDACTED] went to talk about another matter with the Island County Commissioner Helen Price-Johnson, who was out of her office at the time, but [REDACTED] nonetheless spoke with one Secretary in Commissioner Price-Johnson’s office, who voluntarily undertook to contact [REDACTED] regarding the quotation in question. On December 19, a Monday, [REDACTED] following message from Ms. [REDACTED]: “The following link will take you to the [REDACTED] document. http://www.cnichnavy.mil/content/cnic/cnic_hq/regions/cnrnw/installations/nas_whidbey_island/om/environmental_support/jcr_content/par1/pdfdownload_1/file.res/NAS%20Whidbey%20Island%20AICUZ.pdf. A little explication would have been appreciated. The way our legitimate inquiry was handled effectively sent us a message, whether intended or not: I don’t want a dialog and do not bother me. At least, that new referral was to a shorter document - 190 pages.

A couple of hours later, the Secretary to Commissioner Helen Price-Johnson also sent [REDACTED] by email the identical link, but also specified which of the 190 pages in the AICUZ Study the quotation could be found, by saying: “Attached is a link to the 2005 AICUZ Study. The information you are requesting is in the tables on 3-4 to 3-7. Table 3-1 shows the historical flight operations and Table 3-3 next to the last line shows the 6,120 operations at OLF[C] that were projected. I used the Secretary’s information and quickly found the information we had been seeking.

There is a lot of work to do. Or so it seems, to me.

Lastly, I will say that I have never met either [REDACTED] or his predecessor, retired [REDACTED]. But before I even knew there had been [REDACTED] of command, I mentioned to [REDACTED] maybe there was a new Commander somewhere in the Navy hierarchy because the number of "gentlemanly" Growler pilots seemingly had increased and the other side had decreased. Obviously, I have no inside information, but the difference is appreciated. But the overall noise still remains bad.

SECTION 18.**THE NAVY'S DRAFT ENVIRONMENTAL
IMPACT STATEMENT IS NOT AN OBJECTIVE DOCUMENT**

As indicated in Section 1, Congress declared that "it is the continuing policy of the Federal Government . . . to use all practicable means and measures . . . in a manner calculated to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." NEPA further "declares that it is the continuing responsibility of the Federal Government [of which the Navy is a part], to improve and coordinate Federal plans . . . and programs to the end that the Nation may . . . assure for all Americans safe, healthful, productive and esthetically and culturally pleasing surroundings; attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences . . . and achieve a balance between populations and resource use which will permit high standards of living and a wide sharing of life's amenities. . . ." Finally, the Congress recognized and stated that "each person should enjoy a healthful environment and that each person [including military personnel] has a responsibility to contribute to the preservation and enhancement of the environment."

It is my strong belief that the Navy has disregarded these policy declarations of Congress and instead of acting consistent with the NEPA, unilaterally seeks to impose upon the Americans who live in Coupeville and its Environs, a real-life environment that includes terror-by-noise generated by EA-18G Growlers, and for the future proposes to increase the duration of those noise levels, as reflected in the number of proposed FCLP operations, by as much as 575 percent to levels devoid of conscience or concern. There is virtually no acknowledgement in the analyses in the DEIS of either the mandates or the policies of NEPA or any expressed concern for the civilians burdened beyond belief by what, in my opinion, amounts to a unilateral abuse of power by the Navy. Instead, the DEIS would make it possible for the Navy to defy reality and reach a false and untrue conclusion that even by increasing present noise-terror by 575 percent would entail "No Significant Impact" upon fetuses, babies, children, pregnant mothers, elderly people, indeed any human. How, you might ask? Because the Navy has "managed" and directed the data that is included in the DEIS, and the Navy will be the prosecutor, judge and jury in reaching a decision of "No Significant Impact" so that the Navy can then do what it wishes to do, accompanied by an apparent civilians-be-damned attitude, as to the Town of Coupeville and its Environs.

Those are strong words, but in essence there is a similar record reflected by Navy leadership in reaching conclusions and decisions of "No Significant Impact" in countless other episodes.

This has nothing to do with the highly professional and effective manner in which the Navy has performed the Navy's mission, sometimes in exceedingly difficult circumstances. But it does seem to be a feature in several scandals involving Navy personnel over the years, although I have no need to discuss those, other than to wonder whether Navy culture is what it should be, and I have no way to assess that.

A relatively painstaking review of some of the Navy's use of statistical information hopefully, for the reader of this Section of My Comments, will shed the light of day upon some of the data used by the Navy to facilitate a "No Significant Impact" conclusion which is the ultimate Navy

goal. Why without question? Because the Navy chose to use a computer-generated modeling program instead of obtaining actual data as the metric by which to gage Growler noise, or to otherwise verify the data used, or by failing to provide documentation that indeed there exist health issues in their proposals.

The metric, known as a modeling metric, the DNL, which includes the quiet time in a typical 24-hour period of time in a 365-day year in calculating the level of noise resulting from Growler light operations is what is used, but unverified. It does not provide a real-life level of noise exposure. That same computer-generated modeling program could be "set" so that it is limited to flying days and further limited to flying hours in a flying day to better gage the intensity during a flying day of Growler noise as well as the duration of that noise. That could be accomplished in addition to using the present method for some legitimate purposes. Typically, the DNL system is widely utilized and accepted to predict public annoyance with noise environments, and in assessing land developments plans for communities, but not for understanding a narrative about health issues caused by high levels of noise.

The DEIS contains a "No Action Alternative" that would continue the practice of flying 6,100 FCLP operations per year at OLFC and 14,700 at Ault Field, for a total of 20,800 per year. In essence, if selected, the "No Action Alternative" would constitute a continuation of the status quo. It should be noted the the current flight level at 6,100 at OLFC was never a proposal that received full vetting under NEPA or that was the focus of a DEIS.

In documents obtained pursuant to the federal Freedom of Information Act, the Navy has determined that at OLFC there are typically 40-50 flying days per year during which FCLP operations are performed. Assuming that there actually are 45, that would translate into a per-flying day average of 1/45th of the 6,100 FCLP operations performed at OLFC per year. That yields a per-day number of 135 (6100 FCLP's divided by 45 flying days). If the number of flying days per year is 40, the FCLP average per day would be 152½. Most POI's used by the computer modeling program would receive less than that amount. The reason is that at OLFC there is but one landing strip, but there are two runways that are used, primarily dependent upon wind direction as well as the length and width of FCLP Flight Tracks. Normally, landings are executed into a headwind, if available, and take-offs seldom are executed with a tail wind if reasonably avoidable, for safety reasons. Admirals Drive, for example, receives most noise when Runway 32 is used for landings, up to 70 % of all FCLP operations, because of safety issues with Runway 14 relating to the Growler flight capabilities and because of prevailing wind patterns.

Each FCLP operation counts as two flights (one for a landing approach leading to a "Touch" and one for the "Go" which is an accelerated, powered take-off in lieu of a full stop. The Touch is noisy because of a powered landing approach leading to a "Touch" and the "Take-Off is noisy because the aircraft must employ tremendous thrust to obtain appropriate velocity to propel the aircraft to a safe altitude and on to another FCLP with no stop between FCLPs during a "session" that may include as many as five Growlers flying the same flight track during a session. Lots of noise that the DEIS characterizes as "intermittent." While the term "intermittent" makes sense in the context of flying days in a month or year, it makes no sense in the context of Growler noise analysis during a Session of multiple Growlers, but rather is misleading and deceptive, and gives a false impression that belies the reality that there is substantial noise preceding, for example, the arrival of a Growler directly overhead and for a period of time thereafter as the Growler flies on toward another sometimes seemingly unending parade of Growlers flying FCLP loops or tracks that on paper look every bit like a racetrack for horses or cars. When multiple Growlers are flying the same loop (the Navy says no more than

five should fly the same loop in a session), it is more accurate and precise to use the term “intermittent” to describe the presence of “silence” (my term) during a session. Human recovery from living below FCLP flight paths normally could be expected to require a longer “intermission” than what normally is available when FCLP’s are flown by four or five Growlers in four continuous sessions, interrupted only by the need for more aviation fuel and food, or rest for any particular pilot.

Further, a POI at the end of a Runway (32 for example) would receive noise from a “Touch” because of the associated powered landing approach, but not quite as much noise from a “Go” which could be expected to generate noise at the other end of the landing strip (Runway 14), and the noise would vary depending upon the flight track undertaken. The longer the flight track, the more homes there are that would be impacted by noise at OLFC. That noise does not enter into the data utilized by the Navy in the preparation of the DEIS. However, in calculating the very biased DNL calculations, the “relative quiet” of night time is included in their calculations. Yes, DNL calculations, based upon decibel levels includes projected nighttime noise levels (i.e. noise while sleeping) in making those 24-hour averages. In analyzing noise, where the DEIS proposes increasing FCLP operations by up to 575 percent over civilian-only neighborhoods). Thus, for the Admirals Drive POI, the humans living nearby are currently subjected to Growler noise 70% of Touches (70% of 3,050 Touches which would be 2135). If that number of “touches” is divided by an average of 45 flying days per year the Admirals Drive POI would get “touches” at the rate 47.4 per flying day). It also would get noise from take-offs but to a lesser extent because of the attenuation factor of distance from the noise source. Actual measurements could and should be used to determine precisely the amount in both cases. What is important to citizens who live at Admirals Drive is the total dose of noise per FCLP in order to determine whether the total exposure during a single FCLP, or the combined total for all of the FCLPs in each session for each Flying Day exceeds the noise exposure limits set by OSHA and NIOSH (see Section 8., DNL, NIOSH & OSHA, My Comments).

Further, most anyone who lives in the vicinity of the OLFC and who possesses an elementary understanding of which flights involve FCLP’s and which reflect overflights involving Growlers taking off or landing relative to training or other business conducted other than for FCLP operations at OLFC, or for arrival or departure from OLFC, and in instances in which 4 Growler aircraft in in FLCP flight tracks and where there are, say, 4 FCLP sessions in one flying day, the number of noise episodes likely will exceed 47 per day. The only sure way to measure noise at any POI from all FCLPs, from FCLP associated flights to and from Ault Field, from Growler flights from and to Ault Field involving an overflight of the area around OLFC, and from other aircraft such as helicopters and occasional use of OLFC by other Navy aircraft such as F-18E/F’s or other Navy aircraft is to use actual equipment to measure such noise. Not a modeling program written for a computer-generated program that is limited by the particular parameters concocted for a DEIS, and designed to facilitate and support a finding and decision of “No Significant impact”. The DEIS makes no noise projections regarding any flights emitting noise at the communities surrounding OLFC other than FCLP’s although there are a huge number of those, and apparently more are coming from at least three dozen additional Growlers due to be assigned to NAS Whidbey. Aside from FCLP’s, none of that noise is calculated for a noise exposure to OLFC communities, but seem to be factored into calculations for Ault Field because they are referred to in DEIS in the context of Ault Field.

In contrast to Admirals Drive, the POI of Race Lagoon, which is situated to the east of the center point between Runway 14 and 32 of the landing strip at OLFC and which, therefore, receives noise from both powered landing “Touches” and full-powered take-off “Go’s”, and thus would be subjected to noise from all 6,100 FCLP operations per year, which would amount to about

1/45th of 6,100 FCLP operations to arrive at a per flying day number of Growler-flight noise of 135 or 136. I believe the modeling data does not attribute noise to any POI greater than 50%, because it assumes a split of 50/50 for each of Runway 14 and of 32, and not a full 100% for any POI that receives noise from both, like Race Lagoon.

In addition, if actual monitoring equipment had been used, and the data had been recorded, that record would reveal that, for many locations, including my residence at the North end of Runway 14, at a waterfront location on the south side of Penn Cove, even when Runway 32 is used for the "Go" portion of a FCLP, high levels of noise over my home is generated by a Growler while it is executing a relatively tight left turn to the west (sometimes directly overhead, as when a pilot wanders away from a patterned and prescribed track) in preparation for executing another FCLP utilizing Runway 32 and the accompanying flight loop, and is very similar to the intensity and duration of noise generated over my home when a Growler is on approach to a powered landing "Touch" when Runway 14 is being utilized. A separate Table is in the DEIS for each of Scenarios A, B, and C for each of Alternatives 1, 2, and 3 and for the "no Action Alternative."

To accentuate the decidedly wrong assessment for a comparison between the respective Admirals Drive and Race Lagoon POI's, Table 4.2.11 says that for Admirals Drive there will be a maximum sound exposure level of 118 and a level of 114 for Race Lagoon, and those numbers are projected by the modeling program to increase (without explanation) to 121 and 115, for those two POI's. Then, to prove my point, the "number of Annual Events" during which the maximum is projected to be a fact of life for Admirals Drive is 267, and for Race Lagoon is 55, if the "No Action Alternative is selected (See Table 4.2-3). Horrifically, if Alternative 1, Scenario A is selected, the numbers increase bigly for Admirals Drive to 2,650 and to 515 for Race Lagoon. Those numbers are not explained and seem to defy gravity in favor of numbers floating somewhere in the clouds. It is but one of hundreds of examples where simplicity for the sake of ease of understanding has suffered in favor of confounding, under-stated, and unexplained pages and tables that comprise the DEIS. For my purposes it is an example of why the DEIS is unreliable and, in my opinion, designed to facilitate a finding of "No Significant Impact" for whichever of the 10 proposals the Navy wishes to impose upon the civilian communities that surround OLFC.

Civilians living near OLFC likely will be subjected to horrific levels of noise, that may well be in excess of the federal noise limits established by the NIOSH and OSHA dose limits, considering all of the FCLP operations during which each of those POI's, and other non-projected locations, will be subjected to dangerous levels of noise. For Admirals Drive, under Alternative 2, Scenario A, (for example), that number likely would be 70% of all FCLP's anticipated by Alternative 2 which would be 70% of the "Touch" portion of 33,600 FCLP's, which is 70 percent of half of the total number of FCLPs, which is 11760; and for Race Lagoon it could well be 100% of all 33,600 FCLP operations. For Race Lagoon, the number per flying day of Growler noise during FCLPs would be 1/45th (assuming FCLPs are performed 45 flying days per year) of 33,600 = 672 per day, which is ridiculous. To reduce that number to the current level of overflights per day would require the number of flying days per year to be increased significantly to accommodate the number of FCLP operations projected.

I point out that Table 4.2-3 "posts" the number of FCLP's under each of the 4 Alternatives of No Action, Alternative 1A, B, and C. The Alternative and Scenario having the greatest impact on OLFC is Alternative 1, Scenario A. For Race Lagoon, the projected number of times in the year in which the maximum noise would occur is 515, and for Admirals Drive, it is 2,650. What accounts for this difference is unexplained. Even at the POI of Snee-Oosh-Point Which is not

even on Whidbey Island but rather is on Fidalgo Island, the number is 1,033. Race Lagoon is on the Flight Tracks for both OLFC Runway 14 and Runway 32 (opposite ends of the same landing strip at OLFC). Snee-Oosh-Point is not on any runway for either OLFC or Ault Field, so obviously something other than FCLP's are being calculated. Even when FCLP's are performed at Ault Field, the number for Snee-Oosh-Point is less than 1,033 (918). Seems to defy reality. Those numbers, as explained in the narrative preceding Table 4.2-3 is to show "the number of events that would produce the **maximum**" noise exposure expressed in SEL L-max decibels, on a per-day average for the entire year. The maximum exposure level for Admirals Drive, according to that narrative, is "an average of approximately seven times per day. That calculation is made by dividing 2,650 by the number of days in a year (365). 2,650 divided by 365 = 7.26. For Race Lagoon it would be 515 divided by 365 = 1.41. For Snee-Oosh-Point, it would be 1,033 divided by 365 = 2.83. Consider this, for a moment. When the vast majority of FCLP's are performed at OLFC, a place on Fidalgo Island gets more noise. Hard to believe, but take a look at Table 4.2-3.

Including this category of numbers in the DEIS may have a reasonable use, but a consideration of the average amount of noise exposure to civilians living below OLFC-based FCLP's, for purposes of determining the extent to which the Navy is proposing to subject Civilians who live in Coupeville and its Environs, is not one of them. Why? Because under Alternative 1, Scenario A, the DEIS is proposing that 35,100 FCLP's will be flown at OLFC. While Table 4.2-3 tells us how many times the Navy's projections of noise will be at the maximum of 114 L-max Decibels, it only tells us about 2,650 of the FCLP's. It tells us nothing about the other humongous number of FCLP's. That number, if Admirals Drive gets 50% of the FCLP's, would be 35,100 divided by 2 = 17,550 FCLP's (calculation for number of "touches"). 17,550 less 2,650 = 14,900 that may be at a decibel level of 117.4, or 117, or 116 decibels, or whatever. None of them would be stealthy and silent. All 14,900 have to be included in calculating the total exposure for Civilians who live at the Admirals Drive and Byrd Drive POI. The same thing, basically for Race Lagoon, except they would get a longer dose of noise, perhaps, than Admirals Drive because it is close to the side of the landing strip rather than at an end of the landing strip at OLFC.

Two other tables that are insightful, at least in the context of the lack of objectivity in the DEIS, is Table 4-7 and Table 4-8. Those tables purport to indicate for each of the POI's the average indoor nightly awakening by Growler noise and the average daily indoor daytime per hour speech interference from Growler noise, measured in terms of the "Average Year Baseline" scenario. Let's compare the numbers for Ault Field and OLFC by looking at the most susceptible in each category. At first glance, the reader is inclined to compare [REDACTED] (near Ault Field) with Admirals Drive (near OLFC), and say "Wow, [REDACTED] really has it bad. Remember also that proximity to the noise source is a factor when determining the intensity of noise. Presently, for the [REDACTED] POI and for the Admirals Drive POI, the respective DNL's are claimed by the Navy to be 90 and 79, based on the Navy's computer projections (see Table 5-5). The maximum Sound Exposure Levels for those two respective POI's are 121 and 118 (see, for example, Table 4.2-11). The DEIS also claims that 3 decibels are hardly perceptible. In other documents, like NIOSH documents, 3 dB represents a doubling of noise, measured by decibels. The difference in DNL's may be explainable in terms of total traffic, but not all aircraft traffic is counted for any POI near OLFC, while it is counted or considered or factored into the DNL computer projections. In any event, Table 4-7 shows that, for example, the Annual Average Nightly Probability of Awakening if you live on [REDACTED] is 68%. If you average "up" that would mean **100% of the three registered voters who live on [REDACTED]** would be awakened nightly (see Voter Records, [REDACTED], Oak Harbor, WA). Given that the civilians who live near Admirals Drive and Byrd Drive (the full address of

the POI at OLFC) is in a community with more than 400 homes, and is directly below low-level landing approaches at OLFC when Runway 14 is used, and has a peak Maximum Sound Level of of 118 under the current level of flights at OLFC), **it is difficult to have confidence in the Navy's claim that only 13% of those residents would be awakened nightly**. Similarly, under Table 4-8, the Annual Average Daily Indoor Daytime events per hour in which there will be **Indoor Speech Interference for Sullivan Road is claimed to be 10 and for Admirals Drive it is one**. **These numbers are astonishing when you consider that Growler Noise, for example, drowns out the audio on movies, or football or basketball games every single time a Growler flies by while entering or exiting a FCLP, while departing Ault Field or arriving at Ault Field and while flying directly over OLFC, as well as for each FCLP operation involving, for Admirals Drive, at least half of 6,100 or half of 35,100 FCLPs projected to be flown at OLFC by Alternative 1, Scenario A.**

These numbers, as indicated above, are "astonishing" because they are flatly and fully unbelievable. Further, as I indicated elsewhere in My Comments, the selection of POI locations are not identical in terms of selection criteria. My best guess is that the Navy played a role in the selection, on the basis that they "feed" the data to Wyle Laboratories.

The point I am making is that the data in the DEIS is both unreliable, incomplete, and biased. Further, usually in the highly technical world, it is ordinary to include nearly unending detail regarding data and details. For example, you can find online at least two instances in which the United States Air Force utilized a software program called NoiseCheck to check the accuracy of projections made by NoiseMap. The NoiseCheck data is included with the report indicating where the NoiseMap data was in conflict with the NoiseCheck data.

The NoiseCheck report found deviations and the report in that regard contained pages of data so that others could check the work and calculations. In the context of the preparation of the DEIS under consideration with reference to Growlers at Whidbey in the here and now, we have very little evidence regarding the data fed for NoiseMap purposes by the Navy to Wyle Laboratories. Or how many times did the Navy change the data provided to Wyle Laboratories, or was it ever changed by Wyle Laboratories. But it is disconcerting that some numbers relative to comparative noise made by Prowlers and Growlers is different in this DEIS now than before. Prowlers somehow became noisier over time and Growlers became somewhat quieter in some categories of comparison. No explanation is given, which doesn't assist in building confidence.

I now turn to facts derived from the Internet, including the Navy's own websites. I was literally stunned and shocked to learn that the Veterans' Administration has expended the enormous sum of **\$6,048,000,000 for Disability Benefits paid for hearing loss as the Primary Disability** between 1968 and 2006. Moreover, Navy's graph is a strong visual depiction showing the exponential rate of increase in disability payments for hearing loss between 2000 and 2006 (See Chart attached to this Section, provided by the Naval Safety Center, NAVSAFECEN). Keeping in mind that 2006 was an entire decade in the past, it is reasonable to conclude that the exponential rate of increase continued to even more mind-boggling numbers that presently are unreported and unknown to the general public. I also point out that the headline to the chart provided by the Navy is "**STEPS MUST BE TAKEN TO REVERSE THE TREND**". Putting those numbers into context, there apparently are only about 107,000 sailors living and working aboard U. S. Navy ships, but noise is a fact of everyday life in the Navy, even for Navy personnel assigned to shore duty at NAS Whidbey. The final point is to state the obvious, that a civilian who lives in the vicinity of OLFC and is subjected to the noise levels imposed by low-level Growler flights engaged in FCLP operations as well as overflights over OLFC of Growlers, does not have the same recourse of seeking disability payments for

Growler noise, in the event of hearing loss, as either military personnel or civilian personnel employed at NAS Whidbey. We are on our own. That is why it is impossible for me to understand why the Navy stubbornly adheres to the ways of the past, in using a modeling computer forecast to understate the noise problem for the apparent sake of reaching the "easy" decision of "No Significant Impact." It is foreseeable that lawsuits for hearing loss, as well as other physical and mental consequences (perhaps similar to those consequences the formed the basis of lawsuits in Japan resulting in many millions of dollars in damages awarded to the plaintiffs) will be laid at the feet of Navy leadership in the not too distant future. I, along with many of the Navy Veterans who receive disability benefits for hearing loss, am living proof that it doesn't take 40 years, as claimed repeatedly in the DEIS, at present levels of exposure (as said to be the case by the Navy in the DEIS). I have only been exposed to Prowler and Growler noise for 13 years and my hearing has suffered quite a bit. I'm guessing somewhere between 30 - 40 %. Just ask my spouse, [REDACTED] What? While I might have sought protection earlier, was it ok for me to rely upon the Navy's claim that it was safe to be outside in my garden everyday and not worry about hearing loss?

Even if "Noise Terror" is not a fundamental purpose in planning, purchasing, and utilizing increasingly louder and more dangerous aircraft, there is that aspect of Growler-generated noise. That is to say, if "Terror" is a purpose and function of Growler-generated noise, the people who are subjected to that noise terror the most are the Americans who live in the vicinity of a landing strip such as OLFC, or NAS Whidbey, or any other NAS where FCLP's are performed for EA-18G's and F-18E/F's. The number of flights over enemy territory anywhere in the world today, or anywhere since EA-18G's became operational, does not mathematically compare to the number of flights over the homes of people who live where FCLPs are performed and executed, as in the case of OLFC.

Isn't it time for the Navy to admit that it cannot even stop Growler pilots and crews from choosing to live, for example, in Anacortes, Washington, which is not even in the same county as NAS Whidbey or OLFC, as a means to escape FCLP noise. Indeed, of the Six Navy representatives in attendance at the Coupeville scoping meeting in December 2016 regarding the DEIS this question was posed to all but the Base Commander : "Do you live near OLFC or on NAS Whidbey." The answer was a resounding "No" from each person. One person was from Virginia, and indicated a preference to having a 1½ hour long commute in each direction to live away from FCLP noise. The reasons may be varied, but it isn't a stretch of credulity to declare that living near a place like OLFC would be absolutely intolerable for most families of military personnel. The reasons why so many people chose to live near OLFC relate more to a failing of both the Navy and local government officials to apprise people of the full extent and intensity of noise levels inherent upon living close to OLFC. That is to say, the "warnings" and disclosures provided were not adequate, accurate, or clear. In any situation, it is apparent that the Navy, the county government and the real estate brokers/agents all had a hand in diluting the disclosures made to Civilians who bought homes near OLFC in the last 15-20 years. In the OLFC vicinity, it is accurate to say that if there had been a conspiracy between the Navy, Local Governments, and the Real Estate Brokers and Agents who were involved with selling lots and homes near OLFC in one capacity or more, the design of the warnings and disclosures provided at the time I purchased my lot in 2001 would have been a very good model or technique for understating and providing misinformation to delude and fool people into buying property in that vicinity. I believe the courts would look carefully before "sticking-it-to" the civilians adversely damaged and impacted by that scenario. The relative equities are clear and apparent. Further, there is another full-fledged choice - that of the Navy finding a new OLF that will not threaten the health, physical and mental, as well as relative wealth of civilians. If the Navy would do that, or

be required to do that, the issue would be resolved. **A new NAS is unnecessary. A new OLF is essential.**

A 2009 document prepared by the Naval Research Advisory Committee and obtained from a Naval online source (www.NRAC.Navy.Mil/docs/2009_Executive_Summary.pdf) addresses the Navy's dramatic degree of inaction on jet engine noise problems, and states as follows:

"An overarching finding of this study is the paucity of engineering quality data. Standardized engine noise data to compare the engine noise among different aircraft or among various engines do not exist, and the available data do not correlate Sailor or Marine hearing loss with their respective noise exposure environments. Also standards do not exist for acquiring engine noise data for tactical aircraft. . . . Approximately 28% of the VA hearing loss claims are for the Department of the Navy, but data does not exist on the environment that caused the hearing loss. . . ."

"Although the noise levels of commercial jet airliners have been decreasing, the noise levels of tactical jet aircraft have not. In all likelihood, tactical jet noise levels have increased as the velocity and airflow from these engines have increased to produce added thrust. . . . The Navy has not routinely measured aircraft noise and does not maintain a data base of the noise levels of its aircraft. There has never been a requirement for a maximum noise level in military aircraft, and today the Department of Defense does not have adequate understanding of supersonic jet engine noise to establish a realistic maximum noise requirement." [Solutions to noise problems] "will require finding ways to limit the exposure of . . . personnel to areas of high noise. It will require the development of better procedures to monitor the noise exposure and hearing loss of personnel. It will require further development of noise abatement procedures to minimize the noise footprint around Naval . . . Air Stations. And finally, it will require more research into the physiological effects of the full spectrum of noise - including low frequency pressure levels."

It is a fact that while one Growler costs in the vicinity of 85-100 million dollars, the Navy between 2003 and 2009, over a 7-year period, spent only \$15 million dollars on noise reduction investments even in the face of an exponentially increasing amount expended on noise-related military disability benefits. Moreover, it is possible that the Navy could seek funding to replace the EA-18G, which is built on the F-18E/F frame, with an iteration of the F-35, which has louder noise parameters than the EA-18G.

Further, even the NRAC, as well as the International Medical Community (including the medical community in the United States, has expressed alarming concerns about the adverse impact of **low frequency sound pressures** on hearing and internal organs, the sustained exposure of noise of all kinds upon learning and cognition, and situational awareness involving sound. The International Journal of Occupational Medicine and Environmental Health (2005; 18(2): 185-198) stated a simple but alarming warning as a conclusion to its study of whether exposure to **low frequency noise**, as emitted for example by the Growler, can influence mental performance as follows: These findings suggest that LFN [Low Frequency Noise] at moderate levels might adversely affect visual functions, concentration, continuous and selective attentions, especially in the high-sensitive to LFN subjects." It is unacceptable that the biases in the DEIS suggest strongly that the Navy seems content to sweep hearing and health issues under the proverbial rug instead of addressing the issues of continuing to use OLFC as if it was situated on a desolate island far from any human, child, or other living thing. We all deserve better.

A lengthy search of data in the DEIS does not reveal any analysis of the impact upon the civilians who live in the vicinity of OLFC of levels of noise for that many FCLP's, or the economic

impact that will put at risk the economy and lifestyle of Coupeville, which was intact since about 1881, or the risk to the geographical stability of the treasured Bluff's on Whidbey Island (see Sec 11, Vibrations and Concussive Sound Waves: Effects of Thousands of Repeated EA-18G "Growler" Flights on the Bluffs of Whidbey Island, My Comments).

I cannot point to any consideration in the DEIS other than the Navy's wholehearted support to itself and its positions, by taking a singular tack. There is no objective consideration, mandated by Federal Law that is NEPA, to provide balanced, objective analysis of both the Navy position and the clear position of Coupeville, its Environs, and the legitimate concerns of Civilians who live below the noise terror of the Growlers. The absolute silence with which the Navy blithely ignores the possibility of a better situation than they presently have at OLFC, including a permanent end to the bad feelings that exist on both sides of this Navy-created mess, is not silence but a loud Growler-like roar that the Navy will not even attempt to remove itself from the noise mess it has created by continuing to use a temporary landing strip and pretend it is something more akin to LAX. I understand the Navy's position and believe it is nothing more than an extraordinarily selfish act preferred, regardless of the impact upon the economy of Coupeville, or upon the home values, health, and ability to live an enjoyable life without Growler noise terror (See Section 3, Coupeville & Environs: A Quality of Life at Risk of Devastation by the United States Navy; and Section 4, DEIS Economic Benefits to Coupeville & Environs Means Negative Impact Burdens, My Comments). Not even once in 14 years have I seen a Navy vehicle in my neighborhood during the times FCLP operations are performed or at any other time for any purpose, much less to monitor FCLP's from the eyes of a person who lives near OLFC).

Sometimes, I get the feeling that in writing DEIS' the Navy instead of following the mandates of NEPA engages in Information Warfare and Deception. Maybe it is time to revisit NEPA and the Navy's apparent vision and unchecked performance.

18

Environmental Consequences

4-30

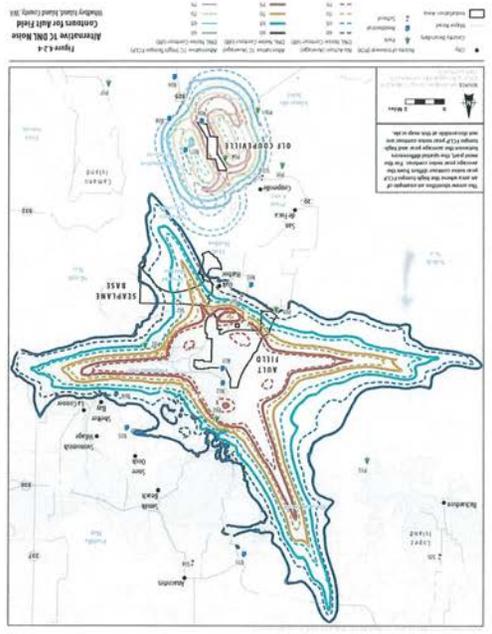


Figure 4-2-4 Alternative 1C DNL Noise Contours for Adult Field

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] Landrey

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:

My mother, husband and I were seriously considering the purchase of a home outside of Coupeville.

As we were standing on the porch talking to our Realtor, a jet flew overhead. We could no longer speak because we could no longer hear. The noise was ^{so} loud we had to cover our ears. After that experience we felt that we could not buy that house.

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

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

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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 citizen

3. Address [REDACTED] Langley VA 22260

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.

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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:

Overflight noise has already caused us to avoid buying property near the air fields. Increasing the noise is unhelpful.

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

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

4.r. Nonauditory Health Effects

Victoria, British Columbia V8S2J8

I live in Victoria and constantly disturbed by the Growler noise at my location. It is stressful and anxiety provoking as sounds like the big earthquake rumble is coming. I am opposed to adding to this noise with the proposal to increase the numbers. Please consider this feedback to keep your neighbours happy

Coupeville, WA 98239

To Whom It May Concern, I've attempted to be aware of the Navy's plan to bring additional Growlers to Whidbey Island, Washington, by attending public meetings, reading local news, talking to other residents, and reading the DEIS, I've come to believe the Navy's first choice is to bring on the additional planes, and to do 80% of the FCLPs at the OLF Coupeville. In my opinion, that's a HUGE mistake. Our Island is being split apart by this whole affair. The people of Oak Harbor hate the citizens of Coupeville, and Coupeville no longer has positive feelings about the citizens of Oak Harbor. Tourism in Coupeville will be destroyed, Property values in Coupeville will plummet, and numerous citizens of Coupeville will be at risk for hearing loss and other physical problems created by the increase of extremely loud noise. I'm not anti Navy. I am strongly in favor of the Navy moving the OLFC to an unpopulated area-or using a carrier out of mothballs to do FCLPs. My husband, [REDACTED] resently submitted his comments (eighteen sections-numerous well researched pages, and well written) to the Navy. I'm very proud of his work and agree with 100% of his comments. Please...the time has come to do the right thing and consider other options. More flights at The OLFC is bad for everyone and will only cause bigger and worse health and economic problems in the future. The time to be proactive and avoid problems for years to come is NOW. Sincerely, [REDACTED]

- 1.a. Thank You
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

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

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.

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 *Quiet Skies over San Juan County*

4. City, State, ZIP *Lopez Island, WA 98267*

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.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.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 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

Detailed Comments

1. According to the Navy, “The Growler is recognizable by the low frequency “rumble” of its jet engines.”¹ Despite this acknowledgement, low frequency noise impacts are ignored in the Draft EIS except for the brief section on Noise and Vibration. Section 3.2 – Noise Associated with Aircraft Operations – makes no mention of the signature low frequency noise of the Growler. All of the noise analysis is based on A-weighted sound (dBA), which ignores the lower frequencies, and is therefore deficient.

Nevertheless, the Draft EIS in the section on Noise and Vibration (page 4-194) states “... the 2012 study included a brief examination of low-frequency noise associated with Growler overflights at 1,000 feet AGL in takeoff, cruise, and approach configuration/power conditions ... The study found that takeoff condition ... overall C-weighted sound level of 115 dBC. The Growler would exhibit C-weighted sound levels up to 101 dBC when cruising and 109 dBC (gear down) at approach.” Page 4-193 states “According to Hubbard (1982), a person inside a structure can sense noise through vibration of the primary components of a building, such as the floors, walls, and windows; by the rattling of objects; ...”

The World Health Organization “Guidelines on Community Noise” (Berglund, 1999)² states:

“When prominent low frequency components are present, noise measures based on A-weighting are inappropriate.”

“Since A-weighting underestimates the sound pressure level of noise with low frequency components, a better assessment of health effects would be to use C-weighting”

Closing windows and doors provides limited reduction for low frequency noise entering a building as measured by sound Transmission Loss tests.³ Therefore analysis throughout the Draft assuming an average noise level reduction across the frequency spectrum with windows closed is not based on scientifically observed behavior of low frequency sounds.

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

2. The Draft EIS states (page 3-16) that aircraft noise levels represented in this draft EIS are “generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville.” It further states that the computer model draws from “a library of actual noise measurements” (page 4- 20). There is no documentation on whether Growler measurements were used or if the model is based on another jet. We also do not know the conditions for the measurements, e.g. engine power, afterburners, distance, orientation, etc. For more information see Sections 2 and 3 of the comment letter (Greacen, 2016).⁴

¹ http://www.cnric.navy.mil/regions/cnrnw/installation/shas_whidbey_island/om/environmental_support/growler-fact.html

² <http://apps.who.int/iris/bitstream/10665/66217/1/a68872.pdf>

³ See graph on <http://windowanddoor.com/article/04-april-2007-understanding-basics-sound-control>

⁴ http://media.wix.com/ugd/f9226a_af2c68d0670d466591fbcd7f062bab13.pdf

RECOMMENDATION: Provide the noise measurement data used for simulation and an explanation of how the data was captured and processed. Provide Growler noise measurements with afterburners in one-third octave bands from 6 Hz to 20 kHz at various distances and orientations. Calibrate the computer model with actual noise measurements in locations throughout the region.

3. The Draft EIS states (page 3-16) “The computer modeling program used for this EIS is NOISEMAP Version 7.2 (October 29, 2015), developed by Wyle Laboratories. ...The U.S. Department of Defense (DOD) uses NOISEMAP as the accepted standard noise modeling program for assessing potential noise exposure from fixed-wing aircraft.” A 2004 study performed by Wyle for DOD states “The latest NOISEMAP package of computer programs consists of ... NOISEMAP Version 7.2 ...”⁵ The version used in the Growler EIS is at least 12 years old, not a year old.

The 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.” SERDP project WP-1304, led by Principal Investigator Dr. Kenneth Plotkin of Wyle issued a final report titled “Advanced Acoustic Models for Military Aircraft Noise Propagation and Impact Assessment” in 2010.

The project summary states “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 GE F414 jet engine as the Growler] differs from those of most prior aircraft, with high noise levels associated with higher thrust engines. ...”

“Moreover, the ... 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 ... model that produces more physical realism and detail than traditional ... model.”⁶

For more information on this issue see Section 1 of the comment letter (Greacen, 2016).⁷

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

4. Day-Night Noise Level (DNL), the fundamental noise metric in the Draft, represents “the energy-averaged sound level measured over a 24-hour period” (Section 3.2.2.1). An FAA study, “Technical Support For Day/Night Average Sound Level (Dnl) Replacement Metric Research,” finds “... DNL has another major practical limitation. It doesn't work particularly well as a predictor of aircraft noise impacts. FICON's 1992 relationship accounts for less

⁵ <http://www.nctcoq.org/trans/aviation/fhs/noisestudy04.pdf>

⁶ <https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>

⁷ http://media.wix.com/ugd/f9226a_af2c68d9670d466591fbd7f062bab13.pdf

San Juan County collects Growler noise reports from citizens (see Comment 6). Figure 4.2 is a chart of the daily reports from 2016. The number of reports over an hour, day, week or other period indicates a level of annoyance. Looking at the daily variability, impact on citizens in San Juan County is clearly intermittent.

The maximum number of noise reports in one day was 75. There were 112 days with no reports. Assume that a day with 5 or fewer reports represents limited annoyance. There were 242 days with 5 or fewer reports. That leaves 124 days with significant annoyance, or about one-third of the year. Averaging significant noise events over 365 days rather than 124 days greatly diminishes the impact citizens experience when Growlers are flying.

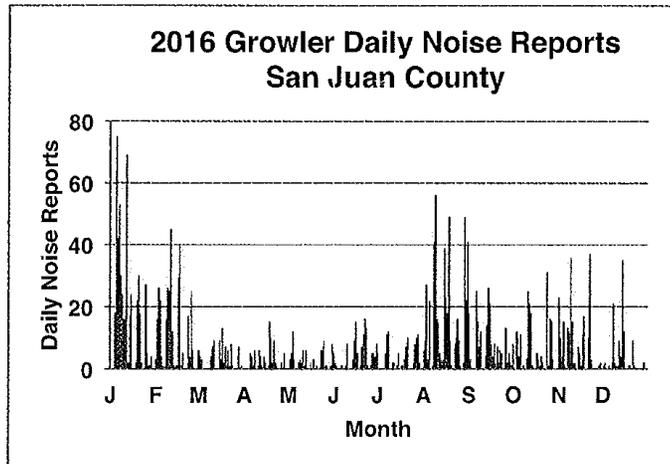


Figure 4.2

Both the Navy flight data and San Juan County citizen noise reports paint the same picture. Growler noise events are intermittent. While commercial airports have busy periods at certain times of the day, they are active 365 days a year. Growler training flight activity at Ault Field has extended quiet intervals, lasting for days or even weeks. When Growler flights resume after a quiet period the noise is startling, increasing the annoyance and health consequences. Averaging Growler noise events over 365 days when the events are intermittent assumes that quiet days mitigate the noisy days. No scientific evidence is provided in the Draft to support that assumption.

The averaging inherent in the DNL metric developed for commercial airports is inappropriate for analysis in the Draft. Averaging over the year greatly underestimates the impacts on citizens and leads to an incorrect conclusion that the region is not significantly impacted by the Proposed Action. Under all the Alternatives, Total Operations increase by 47% over the No Action Alternative (Table 2.3-1). The DNL metric is inappropriate for understanding the consequences.

RECOMMENDATION: For averaged noise metrics, noise levels should only be averaged over active flying days.

5. The Draft EIS at 3-22 states "No studies have shown a definitive causal and significant relationship between aircraft noise and health. Inconsistent results from studies examining noise exposure and cardiovascular health have led the World Health Organization (WHO) (2000) to conclude that there was only a weak association between long-term noise exposure and hypertension and cardiovascular effects."

The statement above disagrees with multiple findings in the WHO "Guidelines on Community Noise" relied on by the Navy (Berglund, 1999):

"For a good night's sleep, the equivalent sound level should not exceed 30 dB(A) for continuous background noise, and individual noise events exceeding 45 dB(A) should be avoided."

"For noise with a large proportion of low frequency sounds a still lower guideline is recommended"

"It should be noted that a large proportion of low frequency components in a noise may increase considerably the adverse effects on health"

"The evidence on low frequency noise is sufficiently strong to warrant immediate concern"

Waye (2004) finds "As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings. Sleep disturbance, especially with regard to time to fall asleep and tiredness in the morning, are commonly reported in case studies on low frequency noise. However, the number of studies where sleep disturbance is investigated in relation to the low frequencies in the noise is limited. Based on findings from available epidemiological and experimental studies, the review gives indications that *sleep disturbance due to low frequency noise warrants further concern.*"⁹

Specific guidelines are found in the "WHO Night Noise Guidelines for Europe" (2005), Table 5.1, "Summary of effects and threshold levels for effects *where sufficient evidence is available.*"¹⁰

During Scoping 1785 comments were submitted on Noise and Vibration and 914 on Health Effects (Table 1.9-5). Under all the Alternatives, Total Operations increase by 47% over the No Action Alternative (Table 2.3-1). The Navy has not demonstrated that there are no health impacts from the proposed Growler additions.

RECOMMENDATION: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise", "Night Noise Guidelines for Europe" and other published studies.

6. The Draft includes some independent noise measurements and ignores others. Section 1.9.5 states "The Navy continues to evaluate noise reports that have been developed by independent sources and review their findings in conjunction with this EIS analysis."

Not included in the Draft EIS is data collected by San Juan County (SJC).¹¹ Data gathered since May 14, 2014 has been regularly sent to NASWI. More than 6000 citizen reports

⁹ <http://www.noiseandhealth.org/text.asp?2004/6/23/87/31661>

¹⁰ http://www.euro.who.int/_data/assets/pdf_file/0017/43316/E92845.pdf

¹¹ <http://sjogis.org/aircraft-noise-reporting/>

include date, time, location and noise characteristics. See a sample chart in Figure 6.1. The Navy should correlate the data with the information they collect on flight tracks to understand what events cause disruptive noise in SJC including location, elevation, direction, engine thrust, etc. In addition, noise reports and measurements should be used to benchmark the computer-modeled noise impacts relied on for decision-making. Noise reports can also help to understand the benefits of potential mitigation measures.

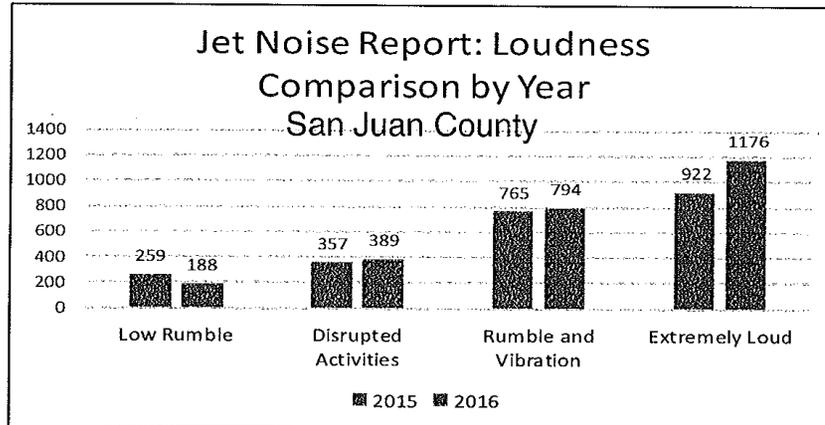


Figure 6.1

Also not included is the study sponsored by Citizens of Ebey Reserve. They engaged an independent noise study by JGL Acoustics in 2013 to obtain actual on-site Growler noise data at Outlying Field Coupeville because "rather than simply accept the computer-modeled data used by Wyle Labs because we believed on-site validation was critical."¹²

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

- At 3.5.2.4 the Draft EIS suggests that the lands and waters of the San Juan Islands National Monument are exempt from National Environmental Policy Act protection because the 2013 proclamation establishing the Monument 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 only has the effect of preserving the status quo: 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 Monument area from federal laws that already applied to wildlife there. Hence

¹² http://citizensofebeysreserve.com/References/Files/JGL_Noise_Report.pdf

creation of the Monument did not exempt the Navy from NEPA or Endangered Species Act with respect to wildlife in the Monument, such as Marbled Murrelets or marine mammals.

At 3.5.2.4 the Draft EIS acknowledges "However, the Bureau of Land Management (BLM) has determined that BLM-owned and controlled lands in the San Juan Islands National Monument possess wilderness characteristics." It also concedes that the Monument is subjected to a maximum noise level of 95 dB (SEL) an estimated 372 times per year (at 3-34).

For more information on this issue see the comment letter (Barsh, 2016).¹³

RECOMMENDATION: 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. In 2014 the Department of Defense successfully demonstrated carrier takeoff, landing, and formation flying capabilities of the X-47B prototype ("drone") that is part of the Unmanned Carrier-Launched Airborne Surveillance and Strike (UCLASS) program.¹⁴

The UCLASS jets can meet the Purpose and Need, delivering the same capability for electronic surveillance and attack against enemy radar and communications systems as the Growlers.

This Alternative has many benefits. Because of its inherent automation UCLASS platforms would significantly reduce the amount of land-based training that impacts our region. It eliminates the high risk to the Growler's two-person crew from advanced anti-aircraft threats. The smaller UCLASS vehicle is lighter and uses less fuel, reducing costs and CO₂ emissions. Eliminating the \$3 billion purchase of 36 Growlers will save taxpayer money. Navy Secretary Ray Mabus said "[the F-35] should be, and almost certainly will be, the last manned strike fighter aircraft the Department of the Navy will ever buy or fly."¹⁵ With a focused effort the Navy can deploy the UCLASS while the existing 82 Growlers plus spares carry out the mission.

RECOMMENDATION: 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 (see Section 3.10.2). San Juan and Jefferson Counties are excluded from the socioeconomic impacts analysis but sites in those Counties appear in the Points of Interest (Figure 3.2-6) and experience significant Single Event Noise (Tables 3.2-4 through 3.2-8). Clallam County may also be impacted by Growler noise but no noise analysis was done for this area.

The San Juan County Comprehensive Plan states "...the islands are places of peace ... We support a pattern of economic growth...which recognizes the rural, residential, quiet, agricultural, marine, and isolated nature of the islands." Anecdotal evidence from San Juan

¹³ http://media.wix.com/ugd/f9226a_c2a40616270749a4b74e6d43bb2a19c3.pdf

¹⁴ <http://breakingdefense.com/2014/08/x-47b-drone-manned-f-18-take-off-land-together-in-historic-test>

¹⁵ <https://news.usni.org/2015/04/15/mabus-f-35c-will-be-last-manned-strike-fighter-the-navy-marines-will-ever-buy-or-fly>

County realtors is that property sales have been lost due to Growler activity. The three counties excluded from the socioeconomic analysis are very dependent on outdoor recreation that is being harmed by Growler flight activity. These Counties receive little, if any, economic benefit from employment and other activity associated with NASWI.

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

10. At 1-20 the Draft EIS discusses Noise Mitigation. The only cited measure in place is "to share flight schedules and other information and to solicit public feedback." Potential measures include construction and operation of a noise suppression facility for engine maintenance (Hush House), Engine Chevrons (noise reduction) and MAGIC CARPET (automating parts of carrier landing which will reduce FCLP training activity).

Further discussion on Existing Mitigation at 3-30 states "NAS Whidbey Island has noise-abatement procedures ... to minimize aircraft noise. Airfield procedures used to minimize/abate noise ... include optimizing of flight tracks, restricting maintenance run-up hours, runway optimization, and other procedures ... Additionally, aircrews are directed, to the maximum extent practicable, to employ prudent airmanship techniques to reduce aircraft noise impacts and to avoid sensitive areas except when operational safety dictates otherwise."

Council on Environmental Quality (CEQ) regulation 1502.14 - Alternatives including the proposed action - states "... agencies shall ... (f) Include appropriate mitigation measures not already included in the proposed action or alternatives."

All three Alternatives are an irrevocable decision to add 35 or 36 Growlers at NASWI. Therefore the Navy should commit to Mitigation Measures as part of the Final EIS and Record of Decision. Since experts have identified the need for additional research on health effects of low frequency noise the Navy should sponsor this research.

RECOMMENDATION: 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 as described in the comments above and by others, and is inadequate to support a decision. Council on Environmental Quality (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."

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

Seattle, WA 98165

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

Please extend the Comment Period ! I request an extension of 45 more days for comments on the Growler expansion to allow more time for people to comment and avoid the busy season !

1.a. Thank You

Papillion, NE 68046

I have flown at OLFs on both coasts and in the deployed Pacific theater and can say that OLF Coupeville is the premier OLF in the Navy. The #1 advantage Coupeville has is its easy access, either by driving or by flying. It is a very short flight away, in the local area, so student aviators don't have the unexpected or unknown to worry so much about. It is also a very short drive for the Landing Signal Officers. No need to leave a day early or waste a flight to get them to the OLF. This can lead to better briefs and debriefs which then leads to better learning. Due to its location and sole use as an OLF (not shared use with 'normal' operations – either military or civilian), the OLF has almost negligible impact from non-FCLP aircraft. This allows the aviators to focus on one thing – bettering landing techniques. It has an extremely low amount of cultural lighting, rarely seen at any military airfield, which is the best simulation for carrier operations anywhere. As a former instructor, I saw vast improvement after OLF Coupeville operations versus any other OLF I had ever flown. An increase in proficiency leads directly to increased safety and combat readiness.

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



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 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

The EIS is so constrained as to be nearly meaningless.

WHAT ABOUT NOT ADDING ANY NEW GROWLER FLIGHTS?
~~What~~ Or better yet, reduce the # of flights?

The claim that our national defense is dependent on increasing the # of flights of these planes is patently FALSE.

Tell Congress you don't need them!

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

Greenbank, WA 98253

I am outraged by the navy's use of the Growler and lack of consideration to civilian health and safety risks, significant economic impacts, and irreparable damage to the quality of life for nature and the residents of Whidbey Island. No other company or commercial enterprise would be allowed to abuse citizens to this degree. 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
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 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
- 12.n. Quality of Life
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville

Greenbank, WA 98253

I am outraged by the navy's use of the Growler and lack of consideration to civilian health and safety risks, significant economic impacts, and irreparable damage to the quality of life for nature and the residents of Whidbey Island. No other company or commercial enterprise would be allowed to abuse citizens to this degree. 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.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 12.n. Quality of Life
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

Greenbank, WA 98253

I am outraged by the navy's use of the Growler and lack of consideration to civilian health and safety risks, significant economic impacts, and irreparable damage to the quality of life for nature and the residents of Whidbey Island. No other company or commercial enterprise would be allowed to abuse citizens to this degree. The jets are flying over schools, hospital, protected historical lands and sites, essential farmland. 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
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 12.n. Quality of Life
- 4.o. Classroom Learning Interference

Greenbank, WA 98253

I am outraged by the navy's use of the Growler and lack of consideration to civilian health and safety risks, significant economic impacts, and irreparable damage to the quality of life for nature and the residents of Whidbey Island. No other company or commercial enterprise would be allowed to abuse citizens to this degree. 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.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 12.n. Quality of Life
- 4.q. Potential Hearing Loss

Greenbank, WA 98253

I am outraged by the navy's use of the Growler and lack of consideration to civilian health and safety risks, significant economic impacts, and irreparable damage to the quality of life for nature and the residents of Whidbey Island. No other company or commercial enterprise would be allowed to abuse citizens to this degree. 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
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 12.n. Quality of Life
- 4.r. Nonauditory Health Effects

Greenbank, WA 98253

I am outraged by the navy's use of the Growler and lack of consideration to civilian health and safety risks, significant economic impacts, and irreparable damage to the quality of life for nature and the residents of Whidbey Island and other areas in the region. 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.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 12.n. Quality of Life
- 4.d. Day-Night Average Sound Level Metric
- 4.g. Average Annual Day/Average Busy Day Noise Levels

Greenbank, WA 98253

I am outraged by the navy's use of the Growler and lack of consideration to civilian health and safety risks, significant economic impacts, and irreparable damage to the quality of life for nature and the residents of Whidbey Island and other areas in the region. 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
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

Langley, WA 98260

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.

Langley, WA 98260

- 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).

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

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").

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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.

Oak Harbor, WA 98277

- 1.a. Thank You
- 5.a. Accident Potential Zones

The length of the OLF runway should be brought to current safety standards. APZs should be accurate and federal funding used to relocate affected properties. No more Growler squadrons should be brought onto our Oak Harbor base due to noise - takeoffs, training and landings affect our neighborhood.

Coupeville, WA 98239

My spouse is retired military; we both understand firsthand the sacrifices military members and their families make. We also have personal experience with the level of noise that already comes from the OLF. The flights that fly over our house often not only last until after midnight, but are so loud, conversation is impossible, let alone sleep. We tolerate this because we understand the need for this type of practice; however, the proposed increase in this activity would represent significant hardship. I am further concerned about the effects of that level and frequency of noise on animals, as well as the reduction in air quality and possibility of chemical contamination of the ground and water. I respectfully call upon your good conscience to seek other options. [REDACTED]

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.k. Range of Alternatives
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

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

Victoria, British Columbia V8N 6L2

We often hear the Growlers late at night, very clear and very loud. We live on water on East side of Vancouver Island, north of Oak Bay. Sound seems to carry great distances across the water. Can be very disturbing. Need some sound barriers close to jets so that sound is deflected UPWARD and not allowed to go horizontally over the water which lets the sound wave energy carry such long distances reflected by the water surface as it travels outward. Any sound engineer can explain the phenomenon. Deflect the sound waves upward as close to the source as possible. I would visualize a large half round earthen berm with sloped sides to deflect sound waves upward at the holding areas and at takeoff when afterburners and thrust (and noise) is at it's fullest.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Mount Vernon, WA 98273

Noise pollution is a danger to our wellbeing and the operation needs to relocate.

Anacortes, WA 98221

Because I live in Anacortes, I hear growlers going overhead. When they do, I have to put my fingers in my ears. There is no way to speak to my husband during that time. Please do NOT allow these growlers to go over the Olympic Peninsula. The animals there cannot put fingers in their ears. People will be disturbed as they seek to enjoy our country's beautiful protected lands. They should be protected from growler aircraft, that is for sure! thank you, [REDACTED]

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area

Anacortes, WA 98221

February 22, 2017 Dear Sirs: I want to comment on the Environmental Impact Statement (EIS) for EA-18G "Growler" Airfield Operations at Naval Air Station (NAS) on Whidbey Island. I live in Anacortes, so growlers often fly over our yard. This morning when we were walking in Washington Park, we had to stop talking while they flew nearby. They are very irritating to human beings, to say the least. Noise brings on stress which is physically measurable. It certainly makes people growl because it is so upsetting !!!!!!! We do have Marbled Murrelets in our area. We sometimes see them swimming around Green Point at WA Park. They are a recognized Endangered Species and must be protected. Their numbers are declining rapidly. How much is known about how they respond to noise or to the shaking of the earth and its trees when growlers fly over? These increasingly rare birds nest in old growth trees. There are a few of these near Deception Pass and Heart Lake, right where noise is so great. Are growlers already partly responsible for these birds' decline? Are these stresses also measurable in these incredible birds which we are so fortunate to have in our area? Any EIS should include extensive, long range studies on the potential for growlers to disturb the nesting, resting, flying, and feeding activities of Marbled Murrelets along with extensive studies of potential consequences for their success at rearing their young. How are growlers interfering with the perpetuation of this declining species? This is extremely important to know. In the meantime, growlers must be stopped from flying over our area. After all, if there is damage being done, it must be stopped; e.g. growlers must be stopped until we know all. The same is true of Port Townsend and the Olympic National Park. These areas are also where humans and wildlife share the air. Birds like the Marbled Murrelet may be hit in the air by an airplane; but we all (ALL) have to listen to that very loud, disruptive, and physically stressful sound. All birds and all wildlife, not just the Marbled Murrelet of course, must be extensively studied, and PROTECTED. You cannot say that knowingly or unknowingly endangering their lives is more important than flying growlers! [REDACTED]

1.a. Thank You

10.a. Biological Resources Study Area

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

4.n. Speech Interference (Indoor and Outdoor)

4.r. Nonauditory Health Effects

Port Townsend, WA 98368

1.a. Thank You

2.d. Program of Record for Buying Growler Aircraft

The upper limit for growlers puts a huge burden on the local residents. A lower limit is reasonable for necessary security. The range is incredibly wide and could lead to almost continuous noise for the area.

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

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:

1.a. Thank You

Victoria, British Columbia V8N 3Z7

I appreciate that you are making an effort to engage the community and deal with the complaints about noise with new technology. It bothers me that here in British Columbia people find it something worth complaining about. I am writing you to let you know I love hearing the Growlers and my only complaint is that we don't get to see them flying over Haro Strait and San Juan Islands. The sound of freedom is fine with me. Thank you for your service.

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

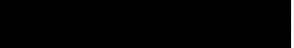
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1. Name 

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

3. Address  *Coupeville WA 98239*

4. Email 

5. Phone 

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

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- 1.e. Risk of Terrorist Attack
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- 12.e. Agriculture Analysis
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- 12.i. Housing Access and Affordability
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- 4.r. Nonauditory Health Effects
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- 7.a. Regional Land Use and Community Character

Comments

Check all that concern you. For additional information see 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)

- 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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Please include any additional comments here:

What else you can do

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 - d. Governor Jay Inslee: 360.902.4111; governor.wa.gov

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Online at: www.whidbeveis.com

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

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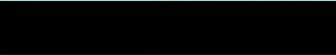
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Public Meeting Comment Form

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;* 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 AREA RESIDENT
3. Address LOPEZ ISLAND, WA 98261
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 THE CENTER OF LOPEZ ISLANDS. WHILE ATTENDING THE DEC. 7TH NAVY INFORMATIONAL AT THE LOPEZ COMMUNITY CENTER I SAW A LOT OF DATA AND HELPFUL FACES Hoping to ANSWER QUESTIONS. THERE WAS A GOOD DEAL OF INFORMATION ABOUT HEALTH EFFECTS OR LACK THEREOF, AND A CURSORY MENTION OF HOW WILDLIFE ~~MUST~~ MUST BE USED TO ALL THE NOISE BY NON. AS I UNDERSTAND IT THE NOISE LEVELS GUESSED AT AND USED IN THE MODELING ALL THIS DATA IS DERIVED FROM IS UNDER ESTIMATED AS COMPARED TO

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
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 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.v. Impacts to Domestic Pets, Livestock, or Wildlife

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CURRENT ACTUAL NOISE LEVELS EXPERIENCED ON LOPEZ AS A WILDLIFE BIOLOGIST I CAN ASSURE YOU THE WILD LIFE IS NOT USED TO IT EITHER. BIRDS STILL FLY INTO A BUND PANIC AS A GROWLER PASSES OVER.

WHAT I DID NOT SEE ANY OF WAS INFORMATION DISCUSSING OR ACKNOWLEDGING THE DELETERIOUS EFFECTS THAT HAVING VERY LOUD WAR MACHINES FLY OVERHEAD HAS ON THE QUALITY OF LIFE, NOT JUST PHYSICAL HEALTH EFFECTS WHICH CAN NEVER BE COMPREHENSIVELY QUANTIFIED ANYWAY.

THIS QUALITY OF LIFE ISSUE NEEDS TO BE ADDRESSED AND IS A MATTER MORE OF LISTENING TO COMMUNITY EXPERIENCES AND CRITICISMS THEN MODELED DATA. IF THE NAVY IS BEING TOLD THAT GROWLERS ARE NOT WANTED FLYING OVER OUR HOMES, THEN THAT IS ALL THE DATA THEY NEED. I REALIZE THE D.O.I.D. IS NOT GIVEN TO BOOTS OF EMPATHY OR CONSIDERATION FOR NEIGHBORING COMMUNITIES.

IT IS NOT ACCEPTABLE THAT THERE IS NO NON-ACTION ALTERNATIVES IN THE RECENT EIS WHEN REDUCED ACTION IS THE ONLY APPROPRIATE COURSE. THIS COMMUNITY IS ALREADY ENRAGED BY THE CURRENT NOISE LEVELS FROM OVERFLIGHTS & ENGINE TESTING AT ADULT FIELD.

THE NOISE LEVELS USED IN THE MODELING NEED TO BE INCREASED AND THE EIS NEED TO BE MORE HEAVILY WEIGHTED TO TOWARD LISTENING TO RESIDENT CRITICISM. A MORE INAPPROPRIATE PLACE FOR ENGAGING IN ONE OF THE LOUDEST ACTIVITIES ON EARTH COULD NOT HAVE BEEN CHOSEN. AN INCREASE IN THESE ACTIVITIES IS THE HEIGHT OF HUBRIS AND WILDLY UNNEIGHBORLY. THESE NOISE LEVELS ORIGINATING FROM A NEIGHBOR WOULD WARRANT IMMEDIATE LAW ENFORCEMENT ACTION.

For more information, please visit the project website at whidbeyeis.com

PUTTING THIS UPON MY ENTIRE COMMUNITY IS UNACCEPTABLE.

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YOUR INPUT MATTERS



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1. Name [REDACTED]

2. Organization/Affiliation NONE

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

VERY INFORMATIVE & PROFESSIONAL
LOTS OF PERSPECTIVES
EXCELLENT EVENT

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

YOUR INPUT MATTERS

1.a. Thank You

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Oak Harbor, WA 98277

Military air bases, i.e. Davis-Monthan AFB in Tucson,AZ, operate over or near Cities throughout the United States. Likewise hundreds of commercial airports operate in highly populated areas. Unquestionably the associated noise of aircraft operating out of these installations has an impact on nearby citizens and wildlife. Aircraft fly low over homes, schools, roads and businesses every hour everyday. It would be beneficial to create a buffer between the air operations and communities but doing so would be cost prohibitive. So citizens adapt to the noise and animals adapt and thrive in their sometimes noisy habitats. The location of Whidbey Naval Air Station is no different from the installations listed above. As such moving the installation, limiting the number or type of aircraft or the number of flights is not economically feasible and unnecessary. Additionally and even more importantly is the clear national security necessity of maintaining the base in its current location. As the only naval air station in our Nation's northwest, operating aircraft designed to detect and respond to a potential foreign intrusion is critical to national defense. I support the continuing operation of Whidbey Naval Air Station, continuing the operation of the Coupeville training site, and the assignment of as many aircraft as necessary to safeguard and preserve our nation.

- 1.a. Thank You
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

November 12, 2016

Public Affairs Office
 Commander US Fleet Forces Command
 1562 Mitscher Ave. Suite #250
 Norfolk, VA 23551- 2487
 fax (757) 836-3601

Regarding recent press release: NAS Whidbey -growfer environmental Impact statement

Is there a problem with noise at NAS Whidbey? It can be overwhelming yes, but we view it as " The sound of freedom "

There is a far worse problem associated with the noise than hearing discomfort. Noise and safety complaints over the year have driven the City of Oak Harbor in cooperation with the US Navy to downzone our property. This has dramatically reduced our allowed uses and the value of our land, this is an effective taking of land by the City and the US Navy.

We should be paid for the land / diminished property value that was taken by actions of the City and US Navy.

To meet the new flight pattern noise and safety zone requirements the City of Oak Harbor and the US Navy conspire to avoid fairly compensating land owners in this zone by arbitrarily applying restrictive zoning regulations and employing denial of use among other tactics. This is being done by the City on behalf of the US Navy to intentionally devalue properties, deny use of, and to avoid paying property owners fair compensation. This is criminal behavior towards us by our local and federal government.

On our site we have been down zoned overnight and effectively denied many uses, our requests for traditional access routes onto our property have been denied, all without just cause and on behalf of the U.S. Navy. We can prove this connection beyond a doubt.

How can the US Navy ask us to survive a loss of value of over \$1.5 million dollars? We pay all of our taxes (and they are exorbitant!) We have faithfully served our military duties and continue our support of active military members and veterans.

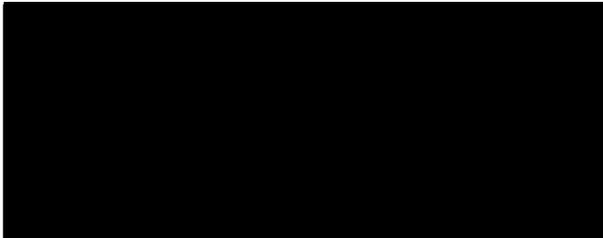
This is beyond reason.



Sincerely



Capt. USA/R 1964-72



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

January 15, 2017

Mr. Ted Brown Public Affairs Officer
U.S. Fleet Forces Command
1562 Mitscher Avenue, Suite #250
Norfolk, VA 23551-2487

Whidbey NAS expansion and Navy EIS comment.

We welcome Navy expansion but it appropriate that the Navy pay off the property owners that have experienced substantial losses in utility and value to their properties resulting from the increase in flight operations and expansion at Whidbey NAS. We have lost \$1.2 million dollars on our property due to downzoning and access restrictions. One neighboring property owner did get compensated by Navy funds at \$2.2 million over ten years ago.(\$400k over appraised value). For years we have been requesting the Navy look into that as possible corruption and fairly compensating us for our losses.

Sincerely,





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2. Organization/Affiliation Citizen
3. Address
4. E-mail
5. Please check here if you would NOT like to be on the mailing list
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I have extreme concern and am against any expansion. I feel as though the info given out tonight is not specific + whitewashed. Employees do not know who put together the proposals, do not show expanded flight paths, etc. I love the Navy personnel, but this is inexcusable. My primary concern is ~~for~~ for drinking water contamination + cognitive development

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YOUR INPUT MATTERS

- 1.a. Thank You
- 11.a. Groundwater
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 4.r. Nonauditory Health Effects

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of my children who go to school in
Coupeville. I love the Navy, but this
~~is~~ is unacceptable.

For more information, please visit the project website at whidbeyeis.com

Please print

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YOUR INPUT MATTERS

La Conner, WA 98257

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. 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 reanalyzed. 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. 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.

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

La Conner, WA 98257

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- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

La Conner, WA 98257

The days and hours of operation are not good, nor is the continuous exposure to noise. The human environment needs preservation. There is practice proposed for electronic warfare and defense without recognition of the collateral human damage to civilian, at home populations.

- 1.a. Thank You
- 3.j. Flight Simulators
- 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

La Conner, WA 98257

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). Already our house in LaConner shakes when planes, off course, go directly over.

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

La Conner, WA 98257

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). Already our house in LaConner shakes when planes, off course, go directly over.

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

LaConner, WA 98257

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.

LaConner, WA 98257

1.a. Thank You

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La Conner , WA 98257

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

La Conner, WA 98257

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.

La Conner, WA 98257

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.

La Conner, WA 98257

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. The long term health consequences to civilians have been ignored.

La Conner, WA 98257

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

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La Conner, WA 98257

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4.j. Other Reports

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1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

LaConner, WA 98257

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.

La Conner, WA 98257

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.b. Flight Tracks and Federal Aviation Administration Regulations

4.a. General Noise Modeling

La Conner, WA 98257

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.

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1.a. Thank You

3.b. Flight Tracks and Federal Aviation Administration Regulations

4.a. General Noise Modeling

Coupeville, WA 98249

- 1.a. Thank You
- 2.e. Public Involvement Process

I had an emotion break down this weekend because the community that we spent our entire inheritance in investing in feels like it is being squashed under the steel-toed boot that is the Navy. I have a history of family members serving as Sergeants in the Navy and the Marines and servicemen of the National Guard. I thought you were here to protect us, but it feels like you are here for your own personal agenda and will squash anyone who is standing in your way. I want to support you, but you make it almost impossible... Please hear our cries!

Coupeville, WA 98239

To whom it may concern: Despite the fact that the DEIS is 1400 pages long, is still significantly fails to identify, and adequately report the level of impact the proposed Navy increase will have on our very fragile economy for the following reasons: 1. Impact of local businesses not adequately analyzed. Diversity is without a doubt vital to the health, prosperity and most importantly, the sustainability of an economy. Local businesses spend more money locally than one non-locally owned industry (the Navy). By creating an economic monopoly, the navy is putting a lot of families at risk of losing their homes and their business. Again, this is not adequately addressed in the DEIS. The economic benefit of an increase in farming, construction, manufacturing, goods and services in both jobs and tax revenue supersede the economic benefit from an increase of military funding. This is based on a 2016 study of the economic impact of the Navy expansion in Island County. 2. Our housing economy is already severely impacted and will continue to rise to crisis levels as we see in increase in military personnel. As military personnel seek housing off island, the impact of vehicle and ferry traffic greatly increase, which also hinders our tourist economy, which brings in significant amount of money for our towns, especially for Langley and Coupeville. We are seeing an ever-expanding increase of homelessness, which will continue to get worse if we are not creating a more diverse economy. An entire community could be wiped out because of the growler increase at OLF. 3. The fact that the water contamination is not even addressed is beyond comprehension, considering this is to address the impact on the environment. Stating that the tests were done after the DEIS had begun is completely unacceptable. 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. "perfluoroalkyl" or "PFAS" are not mentioned anywhere in the DEIS, even though the Navy sent out letters expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Knowledge of the dangers of these chemicals have been around for over 20 years. This expansion cannot be properly evaluated until we know the FULL extent of the contaminated plume and at what levels it has reached. How many wells and how many aquifers have been contaminated? What has been the impact on marine life in the Salish sea due to these contamination. 4. You are putting an already vulnerable community at risk of an attack by having such a large military presence in such sensitive area. The DEIS does not adequately acknowledge the fact that this is putting a giant target on Whidbey Island and the whole of the Pacific Northwest, one few remaining places that has a wealth of fresh water (from rain/snow). The Department of Defense sites on its website "America fights terrorists who plan and carry out attacks on our facilities and our people". FACILITIES! Why is that not addressed in the DEIS? This will continue to be a long winded fight for OUR freedom from the military's impact on its own civilians. I feel more threatened by the presence of the military that I have ever felt from a terrorist. Whidbey Island is not the place for this level of increase. Please respect the health of the American Citizens and this Land you claim to protect!

- 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.i. Housing Access and Affordability
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

-----Original Message-----

From: [REDACTED]
 Sent: Tuesday, January 17, 2017 2:38 PM
 To: WHDB_NASWI_Comments_Mailbox
 Subject: [Non-DoD Source] comments on DEIS re: impact of add'l growler aircraft at Whidbey Naval Air Station

as part time residents of frost island, just east of lopez island in the san juan islands, wa, my wife and i have a 27 year history of living about 15 miles from the whidbey naval air station. for 24 of those years we NEVER once were bothered by the air traffic in and or out of the base. the old Prowler aircraft had a noise signature that was not bothersome to those of us living in the area.

but all that changed radically with the introduction of the Growlers and if the navy's noise measurements don't indicate a radical difference between the 2 types of aircraft (prowler vs growler) then they are using the wrong measuring system. i would wager that nearly ALL of the thousands of noise complaints over the past 3 years have been a result of growler aircraft noise -- it is as different as night and day and suggesting that human habitation and growler aircraft can coexist is simply a fallacy.

the growlers have essentially ruined the peace and calm of the islands and i feel quite certain that tourism and real estate values are already in retreat. the lives of the thousands of residents are in jeopardy and this should not be allowed to happen.

i concur w/each of the findings of the quiet skies organization as follow:

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

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.

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

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."

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

while we realize the critical nature of a national defense, the current flight paths and aircraft mix are ruining our lives. we implore you to stand down and make significant changes such that life in the san juans can return to normal -- to suggest that we simply live w/this horrifying noise is asking too much of the citizenry.

thank you,


frost island, wa

seattle, WA 98115

as part time residents of frost island, just east of lopez island in the san juan islands, wa, my wife and i have a 27 year history of living about 15 miles from the whidbey naval air station. for 24 of those years we NEVER once were bothered by the air traffic in and or out of the base. the old Prowler aircraft had a noise signature that was not bothersome to those of us living in the area. but all that changed radically with the introduction of the Growlers and if the navy's noise measurements don't indicate a radical difference between the 2 types of aircraft (prowler vs growler) then they are using the wrong measuring system. i would wager that nearly ALL of the thousands of noise complaints over the past 3 years have been a result of growler aircraft noise -- it is as different as night and day and suggesting that human habitation and growler aircraft can coexist is simply a fallacy. the growlers have essentially ruined the peace and calm of the islands and i feel quite certain that tourism and real estate values are already in retreat. the lives of the thousands of residents are in jeopardy and this should not be allowed to happen. i concur w/each of the findings of the quiet skies organization as follow: 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

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

- 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.k. Comparison of the Prowler to the Growler
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

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." ACTION: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared. while we realize the critical nature of a national defense, the current flight paths and aircraft mix are ruining our lives. we implore you to stand down and make significant changes such that life in the san juans can return to normal -- to suggest that we simply live w/this horrifying noise is asking too much of the citizenry. thank you, [REDACTED] frost island, wa

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 SHAW 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

- 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
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- 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.a. Regional Land Use and Community Character
- 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

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

It Disrupts the peace of this
Beautiful Land and adds
stress to my life

Seattle, WA 98117

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

I oppose expansion of Growler operations as too destructive to the community, and to the environment, as well as being wasteful and unnecessary. Alternatives should be developed. Thank you for considering all views. Sincerely, [REDACTED] in Seattle

langele, WA 98260

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.

Langley, WA 98260

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
12.c. Socioeconomic Impacts

Please thoroughly investigate the water contamination issue with PFOA. We can't be poisoning our country's wells in the name of defense. There will be a negative economic impact for businesses and home/land values. The impact on the health of our community, including our children, needs to be fully addressed.

Grapeview, WA 98546

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

Grapeview, WA 98546

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

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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.

Grapeview, WA 98546

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

Grapeview, WA 98546

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.

Grapeview, WA 98546

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.

Grapeview, WA 98546

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).

Grapeview, WA 98546

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.

Grapeview, WA 98546

1.a. Thank You
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Grapeview, WA 98546

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

Grapeview, WA 98546

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.

Grapeview, WA 98546

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

Grapeview, WA 98546

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.

Grapeview, WA 98546

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- 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

Grapeview, WA 98546

- 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.

Grapeview, WA 98546

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.

Grapeview, WA 98546

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.

Grapeview, WA 98546

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.

Langley, WA 98260

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 than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

Langley, WA 98260

- 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).

Langley, WA 98260

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

Langley, WA 98260

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

Langley, WA 98260

1.a. Thank You

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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 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.

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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 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

Langley, WA 98260

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.

Langley, WA 98260

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

The DEIS confuses and mis-represents 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.

Langley, WA 98260

1.a. Thank You

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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.

Langley, WA 98260

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.

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").

Langley, WA 98260

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.

- 1.a. Thank You
- 3.a. Aircraft Operations

Olga, WA 98279

Thank you for asking for the public's comment. I do respect the F18 crews and the budget for this aircraft versus the over budget F-35. I would hope we would build more F-18's than the new F-35. Having said that, a few years back we noticed a very powerful low frequency noise, perhaps of the plane's afterburners practicing take off. It was annoying and a bit overwhelming. Since this time I have not noticed it as much. Perhaps you are not doing that as much, or we have been out of town when the Navy was practicing this powerful jet engine rush. We are on Orcas Island. As long as you are respectful of time of day, and refrain from the higher power, afterburner, or whatever it was that made that very powerful noise, I am ok with you practicing and extending the fleet of planes. As long as you are keeping the safety of the flight crews intact, your on the ground personnel, and the surrounding public than that is good for me. It would be nice if the pilots could refrain from higher speeds or power takeoffs until over the Pacific ocean or under populated areas. Thank You, [REDACTED]

Greenbank, WA 98253

1.a. Thank You
10.m. Impacts to Marine Species and Habitat
2.h. Next Steps

Past experience with you tells me my comments will make no difference but I wish you to know that the people of Washington State care about our quality of life. The Navy repeatedly does not hold to these values whether it is scrapping copper paint off its vessels into Salish Sea waters, or blasting our eardrums, and those of marine mammals, with repeated underwater and air operations. First the Prowler and now the Growler repeatedly disturb and destroy our peace - all in the name of PEACE. I do not support your expanded use and do not believe you have shown sufficient reason for the expansion,.

1.a. Thank You
12.n. Quality of Life

Victoria, British Columbia V8N 1J6

The continued low-frequency noise generated by the NAS on Whidbey Island has negatively affect my family's quality of life.

Port Angeles, WA 98363

My home on the edge of Olympic National Forest is directly under the current flight path for jets going to the test site. I get overflies at least 3 times a day for both directions of the flight path. Approx at 5 - 10,000' elevation. The jet noise is quite noticeable for the duration of the flyover. If the flights could be moved to fly over the Strait of Juan de Fuca that would be preferable. Airspace seems available and less disruptive. Thank you for the opportunity to comment.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations

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.whidbeveis.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)
[REDACTED]
- 3. Address [REDACTED]
- 4. Email NA
- 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
- 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

Comments

Check all that concern you. For additional information see www.facebook.com/whidbeveis

- 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.**
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- 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
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
 - b. U.S. Senator Maria Cantwell: 425.303.0114; www.cantwell.senate.gov
 - c. U.S. Congressman Rick Larson: 800.652.1385; rick.larsen@mail.house.gov
 - d. Governor Jay Inslee: 360.902.4111; governor.wa.gov

To Learn More

- ✓ To receive email updates, or to get involved, **email us** at coupevillecommunityallies@gmail.com
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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; 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 [REDACTED]

2. Organization/Affiliation _____

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

Our community is already overwhelmed by the present amount of flight patterns & sound. Many people are losing their hearing & have physical ailments due to the noise. The community is more populated than in the 40's - more people, kids & schools & the old field is in the middle! I do not want an increase in the flights here. Take them to the Mojave Desert - A short flight away - and no community to effect. Now our water is at stake - in jeopardy due to the PFOA's & contaminants!! No more - no more jets. And no

Please print • Additional room is provided on back
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YOUR INPUT MATTERS

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Not concentrate them here, AS, if they are all
in one place - an enemy can take them all out
at one time - not a good military move.

The Pacific Northwest is a beautiful place on our
planet - it has been impacted enough already
NO MORE!!

For more information, please visit the project website at whidbeyeis.com

Please print

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Health is important not only personally but part of a community's health. I do not want the increase of the Growlers flights on Whidbey Island!! More of the lights to the midwest desert - where people do not live. This island will be ruined - it is too populated - we have kids in schools - who will not learn properly due to the interruptions of the lights & the noise. It is too loud & it is harmful - as proven by authorities of outside sources. Home values will go down because of the increase in CRASH ZONES. This is a "Reserve" there should not

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YOUR INPUT MATTERS

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones



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Be this typed activity here - or on the Olympic peninsula? Now we have well water contamination which the Navy did closed - late, why was that? NO NO NO - NO MORE!!

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Please print

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YOUR INPUT MATTERS

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

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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, WA 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. *!! a CRASH ZONE*

(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.c. Socioeconomic Impacts
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
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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
- 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:

Noise, Health issues & water contamination & loss of property values.
 Navy did not address these properly - especially the water contamination & impact on housing & infrastructure on the island; as it will bring more people on an already delicate island. We don't have the housing or the resources to accommodate these people.
 The "noise" harms us now & we depend on tourism greatly - that won't continue with an increase by the Navy.

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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:

- ① The Island water contamination is not addressed in the EIS.
- ② the Infrastructure of the island can not handle 700+ more households & more people. there is not enough housing now.
- ③ the "noise" can't be tolerated by the community. Health problems are caused by the noise & children harmed.
- ④ Not A good policy to have all the planes here - safety for the nation it's not. The Island has only 1 Bridge & 2 ferries Not good for national security.

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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:

I am concerned about the amount of flights that will go non-stop all day and after midnight

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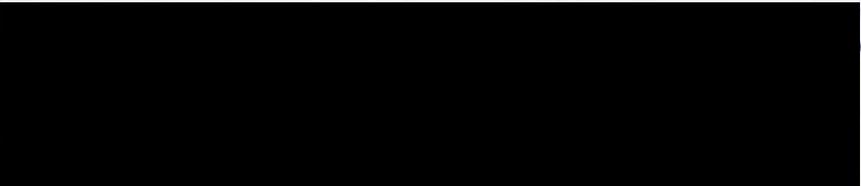
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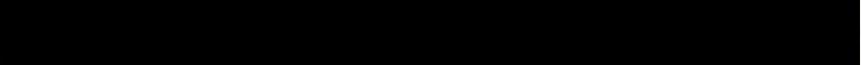
Online at: www.whidbeveis.com

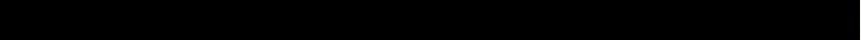
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(over)

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 - b. U.S. Senator Maria Cantwell: 425.303.0114; www.cantwell.senate.gov
 - c. U.S. Congressman Rick Larson: 800.652.1385; rick.larsen@mail.house.gov
 - d. Governor Jay Inslee: 360.902.4111; governor.wa.gov

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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;** 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 USA
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

- ① I BUILT MY HOUSE STARTING 46 YEARS AGO IN A VERY QUIET PLACE. I AM RETIRED AND I CANNOT AFFORD TO MOVE.
- ② WHY CAN'T THIS TRAINING HAPPEN IN A REMOTE AREA WITH VERY FEW PEOPLE - MONTANA, WYOMING??
- ③ WHAT HAPPENS WHEN A PLANE CRASHES INTO A SCHOOL OR HOSPITAL.
- ④ HOW DO CARRIERS PROTECT US, IF SOMEONE WANTS TO INVARE THE USA WE DO NOT NEED CARRIERS TO DEFEND OURSELVES.

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.a. Purpose and Need
- 2.j. Costs of the Proposed Action
- 2.n. Alternatives Considered But Eliminated
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children



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
2. Organization/Affiliation retired Public Health Nurse
3. Address Lopez Island WA
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

- 1) Please analyze the noise impacts from Lopez
- 2) Consider flight plans that are away from Lopez School, the Children's Center in the Village by the Community Center
- 3) Analyze the water quality along the shores for evidence of fuel dumping.
- 4) Analyze health effects of stress related to low frequency sound on heart, psychologic impact.

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.k. Range of Alternatives
- 3.a. Aircraft Operations
- 4.l. Points of Interest
- 4.r. Nonauditory Health Effects
- 6.f. Fuel Dumping

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.

This whole presentation feels like
incredible excess and waste of tax
payers money.

The design of the event with
station after station is exhausting
makes you feel disempowered.

There are no options to decrease
planes and use our tax dollars
for what matters most - education
& health care.

I agree with the statement expressed
at the meeting. Shame on you
all for this waste of resources
money, human resources

For more information, please visit the project website at whidbeyeis.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

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 _____

3. Address [Redacted] Lopez Island 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.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

- 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:

I agree with the comments listed above

(Continue on the back)

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 20kHz. 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

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

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

Lopez Island, WA 98261

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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

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

1.a. Thank You

Greenbank, WA 98253

I fully support the training activities for our military personnel, and believe that the EIS adequately addresses any issues identified. I support the Navy proceeding with the training as proposed.

Port Angeles, WA 98363

I am opposed to the U.S. Navy's proposal to expand an electronic warfare range with extensive Growler aircraft traffic on the Olympic Peninsula. I love the peace and quiet of the Olympic Peninsula; I love the wildlife here. Please do not let the U.S. Navy destroy my tranquil home! If the U.S. Navy were to expand an electronic warfare range on the Olympic Peninsula, the residents and the wildlife here would be exposed to horrific noise, horrific carbon dioxide emissions, and horrific electromagnetic radiation. The Environmental Impact Statement issued by the U.S. Navy is flawed, since it fails to analyze aircraft impacts between Whidbey Island and the proposed electronic warfare range, it fails to use real aircraft sound measurements, it fails to assess the complete flying range within the Olympic National Park and World Heritage Site, and it fails to contain the projected flight paths. Lacking essential analysis, the Navy's Environmental Impact Statement is invalid.

1.a. Thank You

1.b. Best Available Science and Data

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

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

2.c. Compliance with the National Environmental Policy Act

Port Angeles, WA 98363

To the EA-18G EIS Project Manager: I oppose EA-18G Growlers around Whidbey Island and around the Olympic Peninsula. I enjoy the peace and tranquility of my home and surrounding environment. These past few months, I can already hear increased military presence flying around my neighborhood, which upsets me. The EA-18G Growlers would destroy my tranquil home. Please don't destroy my home! I explain reasons for my concerns below: 1. Jet noise outside the immediate runway area on Whidbey Island is not being evaluated, but its impacts are significant. You need to examine more than just Growler landings and takeoffs and the small area within 6-10 miles of the runways. Growlers are incredibly loud, whenever and wherever they're flying, so examining only takeoffs and landings is insufficient. 2. The Navy failed to measure or model the effects of Growler jet noise around my home in Port Angeles and around my home environment, the Olympic Peninsula. The recent increase in military flights around my home is bad enough; please don't make it worse. I work in Forks, on the West End, which your model completely ignored. Your assessment fails to consider noise impacts on the residents of the Olympic Peninsula. 3. The Navy incorrectly claims that areas outside of its narrow study area fail to exceed noise standards. The Navy used an unrealistic standard by averaging sound over a year, instead of measuring peak noise levels. The Growler's peak noise levels are extremely frightening, anxiety-provoking, and intense. Many people, including myself, would spend quiet time worrying about when the next scary Growler sound would jolt them. That's no life; that's a living terror! 4. The Navy's noise analysis fails to address peak noise levels, which are frightening and intense. 5. The Navy's noise analysis fails to include the Growlers' low frequency noise, which is also quite loud and intense. 6. According to the Department of Defense, the software that the Navy used for modeling, NOISEMAP, is severely outdated and inaccurate. 7. Noise standards for commercial airplanes do not and should not apply to military jets; they are completely different. Military jets uniquely fly at low altitudes, practice landing on very short runways, have afterburners, perform aerial combat maneuvers, and carry powerful electromagnetic weapons. 8. The Navy released new information that it now plans to fly Growlers on weekends. This was not included in the draft EIS. The Navy needs to cooperate with towns that depend on tourism for revenue. Growler flights on weekends will scare tourists away. 9. Low Growler flights will make even more horrific noise than ever. According to the Airport Environmental Support Office, Growlers are to avoid flying low in populated towns, even in sparsely populated areas. Growlers can produce 150 decibels of sound at takeoff, quite a significant sound that has not been studied. 10. The draft EIS fails to list sound levels for these low flights (Growlers flying at either 1,000 feet or 1,500 feet above ground level). The report needs to include these sound levels. 11. It is illegal to piecemeal projects in order to avoid analyzing the cumulative effects. The Navy, however, has pieced together Growler training and testing into 6 or more separate projects. The draft EIS, assessing only 1/4 to 1/3 of the total Growler fleet, erroneously concludes lack of significant negative impact. 12. In violation of federal council, the draft EIS fails to assess reasonable noise-reduction alternatives. The 3 alternatives that the Navy presents merely shuffle the same number of total flights among runways in 3 different communities. This is not a true assessment of alternatives. 13. The draft EIS fails to mention or discuss the effects of electromagnetic radiation associated with use of

- 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
- 12.n. Quality of Life
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 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.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
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville

the Growlers. It fails to describe impacts of the Growlers interacting with the ground transmitters, and it fails to describe impacts of electromagnetic weaponry practice by the airplane crew. 14. The draft EIS fails to analyze Growlers' impacts on groundwater and soil associated with use of firefighting foam on runways during Growler operations. Before the draft EIS was published, however, the Navy notified 2,000 Whidbey Island residents about contaminated drinking water wells due to leakage of poisonous carcinogenic chemicals from Navy property. These 2,000 people became dependent on bottled water due to the Navy's errors. 15. Although the Navy reports that its Northwest Training Range Complex EIS evaluated noise in 2010 on the Olympic Peninsula, the document failed to do so. Ground based mobile emitters were not listed as an emission source. The Olympic Peninsula was not listed as an area of electronic combat and attack. No documents have assessed Growler noise impact on the Olympic Peninsula, my home. 16. Since the current noise modeling fails to assess exposure from the new low flight levels, it must be thoroughly analyzed in a updated EIS. This mandates a new adequately long public process, complete with an official comment period. 17. The draft EIS completely ignores contamination of drinking water in residential and commercial areas near the runways caused by the Navy's use of hazardous chemicals. The 1,000% increase in Growler flights over a 7 year period mandates analysis of groundwater and soil for contamination. 18. The Navy knew about contamination of residential drinking water prior to the publication of the draft EIS. In May 2016, the Environmental Protection Agency issued health advisories for chemicals used by the Navy on Whidbey Island, but the draft EIS failed to assess these chemicals. Several days prior to publication of the draft EIS, the Navy informed Whidbey Island residents with drinking water wells that poisonous carcinogenic chemicals had leaked from the Navy property. Unfortunately, soil and groundwater contaminated with these chemicals cannot be treated, according to the Department of Defense. 19. The draft EIS fails to discuss soil contamination. It erroneously discusses only the impact of new construction, incorrectly concluding lack of groundwater impact. The Navy omitted discussion of the toxic chemicals used by the Growlers and its toxic chemical leak on Whidbey Island. The Navy needs to pay the costs of a permanent alternative water source for affected Whidbey Island residents, and it needs to pay medical costs associated with accidental intake of the contaminated water. 20. The draft EIS piecemealed impacts upon wildlife, which is illegal. In limiting analysis to small areas within 6-10 miles of airport runways, the draft EIS omitted assessing threatened species, endangered species, sensitive species, and wildlife habitat areas negatively impacted by Growler flight operations, landings, and takeoffs outside of the Navy's narrow study area. The projected 244% increase in aerial combat maneuvers outside of the limited study area, for example, has not been assessed. The draft EIS completely omitted impacts on wildlife and wildlife habitat. 21. The draft EIS cites only research from 1988, without considering newer research from 2014 and 2015. The newer research includes an important 2014 study titled "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," as well as a 2015 peer-reviewed research summary. The draft EIS needs to incorporate the best available research, instead of the most convenient research. 22. With low altitude flight, the student Growler pilots are more likely to cause extreme physical, mental, and economic harm, including airplane crashes and death. 23. The draft EIS fails to mitigate for local schools, which will be interrupted by Growler jet noise hundreds of times every day. Mitigation measures for the schools would alter the Navy's proposed plans and would require another public comment period. 24. The current comment period on the draft EIS should not be the

public's final chance for input. The Navy announced on its website that it would not allow public comment on the final EIS. Since the Navy's plan adversely impacts Olympic Peninsula residents, tourists, wildlife, and environment, however, the public, according to federal law, must be allowed an ample comment period. The Navy needs to be responsive to public concerns about the Growlers. The Navy's proposed Growler project around Whidbey Island and the Olympic Peninsula fails to protect me as an American Citizen. It simply threatens to destroy my beloved home. Sincerely, [REDACTED] Port Angeles, WA

██████████
 ██████████
 Port Angeles, WA 98363

2/14/2017

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

To the EA-18G EIS Project Manager:

I oppose EA-18G Growlers around Whidbey Island and around the Olympic Peninsula. I enjoy the peace and tranquility of my home and surrounding environment. These past few months, I can already hear increased military presence flying around my neighborhood, which upsets me. The EA-18G Growlers would destroy my tranquil home. Please don't destroy my home! I explain reasons for my concerns below:

1. **Jet noise outside the immediate runway area on Whidbey Island is not being evaluated, but its impacts are significant.** You need to examine more than just Growler landings and takeoffs and the small area within 6-10 miles of the runways. Growlers are incredibly loud, whenever and wherever they're flying, so examining only takeoffs and landings is insufficient.
2. **The Navy failed to measure or model the effects of Growler jet noise** around my home in Port Angeles and around my home environment, the Olympic Peninsula. The recent increase in military flights around my home is bad enough; please don't make it worse. I work in Forks, on the West End, which your model completely ignored. Your assessment fails to consider noise impacts on the residents of the Olympic Peninsula.
3. **The Navy incorrectly claims that areas outside of its narrow study area fail to exceed noise standards.** The Navy used an unrealistic standard by averaging sound over a year, instead of measuring peak noise levels. The Growler's peak noise levels are extremely frightening, anxiety-provoking, and intense. Many people, including myself, would spend quiet time worrying about when the next scary Growler sound would jolt them. That's no life; that's a living terror!
4. **The Navy's noise analysis fails to address peak noise levels, which are frightening and intense.**
5. **The Navy's noise analysis fails to include the Growlers' low frequency noise, which is also quite loud and intense.**

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
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- 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.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
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- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
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6. **According to the Department of Defense, the software that the Navy used for modeling, NOISEMAP, is severely outdated and inaccurate.**
7. **Noise standards for commercial airplanes do not and should not apply to military jets;** they are completely different. Military jets uniquely fly at low altitudes, practice landing on very short runways, have afterburners, perform aerial combat maneuvers, and carry powerful electromagnetic weapons.
8. **The Navy released new information that it now plans to fly Growlers on weekends.** This was not included in the draft EIS. The Navy needs to cooperate with towns that depend on tourism for revenue. Growler flights on weekends will scare tourists away.
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15. **Although the Navy reports that its Northwest Training Range Complex EIS evaluated noise in 2010 on the Olympic Peninsula, the document failed to do so.** Ground based mobile emitters were not listed as an emission source. The Olympic Peninsula was not listed as an area of electronic combat and attack. No documents have assessed Growler noise impact on the Olympic Peninsula, my home.

16. **Since the current noise modeling fails to assess exposure from the new low flight levels, it must be thoroughly analyzed in a updated EIS.** This mandates a new adequately long public process, complete with an official comment period.
17. **The draft EIS completely ignores contamination of drinking water** in residential and commercial areas near the runways caused by the Navy's use of hazardous chemicals. The 1,000% increase in Growler flights over a 7 year period mandates analysis of groundwater and soil for contamination.
18. **The Navy knew about contamination of residential drinking water prior to the publication of the draft EIS.** In May 2016, the Environmental Protection Agency issued health advisories for chemicals used by the Navy on Whidbey Island, but the draft EIS failed to assess these chemicals. Several days prior to publication of the draft EIS, the Navy informed Whidbey Island residents with drinking water wells that poisonous carcinogenic chemicals had leaked from the Navy property. Unfortunately, soil and groundwater contaminated with these chemicals cannot be treated, according to the Department of Defense.
19. **The draft EIS fails to discuss soil contamination.** It erroneously discusses only the impact of new construction, incorrectly concluding lack of groundwater impact. The Navy omitted discussion of the toxic chemicals used by the Growlers and its toxic chemical leak on Whidbey Island. The Navy needs to pay the costs of a permanent alternative water source for affected Whidbey Island residents, and it needs to pay medical costs associated with accidental intake of the contaminated water.
20. **The draft EIS piecemealed impacts upon wildlife, which is illegal.** In limiting analysis to small areas within 6-10 miles of airport runways, the draft EIS omitted assessing threatened species, endangered species, sensitive species, and wildlife habitat areas negatively impacted by Growler flight operations, landings, and takeoffs outside of the Navy's narrow study area. The projected 244% increase in aerial combat maneuvers outside of the limited study area, for example, has not been assessed. The draft EIS completely omitted impacts on wildlife and wildlife habitat.
21. **The draft EIS cites only research from 1988, without considering newer research from 2014 and 2015.** The newer research includes an important 2014 study titled "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," as well as a 2015 peer-reviewed research summary. The draft EIS needs to incorporate the best available research, instead of the most convenient research.
22. **With low altitude flight, the student Growler pilots are more likely to cause extreme physical, mental, and economic harm, including airplane crashes and death.**
23. **The draft EIS fails to mitigate for local schools, which will be interrupted by Growler jet noise hundreds of times every day.** Mitigation measures for the schools would alter the Navy's proposed plans and would require another public comment period.
24. **The current comment period on the draft EIS should not be the public's final chance for input.** The Navy announced on its website that it would not allow public comment on the final EIS. Since the Navy's plan adversely impacts Olympic Peninsula residents, tourists,

wildlife, and environment, however, the public, according to federal law, must be allowed an ample comment period. The Navy needs to be responsive to public concerns about the Growlers.

The Navy's proposed Growler project around Whidbey Island and the Olympic Peninsula fails to protect me as an American Citizen. It simply threatens to destroy my beloved home.

Sincerely,

A solid black rectangular box redacting the signature of the sender.

Port Angeles, WA

Lynnwood, WA 98036

The Olympic National Park was designated by UNESCO as an International Biosphere Reserve in 1976. Man and the Biosphere Programme (MAB) is an intergovernmental scientific programme that aims to establish a scientific basis for the improvement of relationships between people and their environments. The noisy Growler war games and trainings proposed by the Navy for this area is outrageous. Our National Parks are places to renew and restore our spirits. Destroying this area will do more harm than your trainings can repair.

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

Lynnwood, WA 98036

1.a. Thank You

18.a. Climate Change and Greenhouse Gases

4.q. Potential Hearing Loss

How could anyone even think of stationing these planes near human habitation! With a noise level that can instantly cause permanent hearing damage, they are a danger to both people and wildlife. With their rate of fuel consumption and CO2 pollution, they should in fact not be allowed to fly anywhere. Climate change is a crisis, and must be considered in any environmental study.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Langley, WA 98260

As a citizen of Whidbey Island I am very concerned with the proposed expansion of the Growler flights on Whidbey. The large and sudden increase in flights does not allow the community, animals or the surrounding businesses a fair chance to adjust and prepare for such a large scale change. The increase in noise, pollution, and dangerous chemicals will negatively impact the children, environment and very place you are sworn to serve and protect. I support the Navy being here on Whidbey, and am very grateful to the men and women that serve our country, but I ask that a more reasonable number of flights be considered. There has to be another area in the country with a smaller, less diverse ecosystem that could be considered. I ask that you reconsider the large scale increase of these planes and the unfair impact they will have to thousands of innocent bystanders.

Nordland, WA 98358

This new WA DC administration is increasing the budget for our military. Consider training as part of the cost of the Growlers & send the planes & boys to Idaho or some other open space where they are welcomed. A major problem with the 15%, 18% & 20% increase in dB is still a problem if the additional impact was 0%. It was finally explained in a rational way by a County Board member: Using an "average" of the dB as being non toxic or non lethal is a bogus way to measure the growler noise. Say you poked a stick or knife into someone's stomach 1/16 of an inch every 15 minutes over a 23.75 hour period, but poked the same item into that stomach 8 inches just once, the person would likely be dead, but the average "poke" would be just above 1/16 of an inch. You need to find another way to measure the true impact on human hearing... and on animal hearing. ■■■

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric

Victoria, British Columbia V8N 5S6

It is not known how many Growlers you have now - so it is difficult to assess the noise impact when you add 35 more. On reading the list of your five public meetings I note you have made no mention of Canadian interests. Hopefully you are considering Canadian input beyond submissions such as mine. Unfortunately your noise is our noise. Please ensure you contact appropriate Canadian authorities.

- 1.a. Thank You
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process

1.a. Thank You

Anacortes, WA 98221

OLF Coupeville is critical to our aircrew's proficiency when operating around the aircraft carrier. The environmental and the pattern design of the OLF better simulate those at the ship. The skills the pilots develop while practicing at OLF Coupeville can not be gained in a simulator and while FCLPs at NAS Whidbey can fill some of that requirement, the pattern at Whidbey is designed in such a way, the pilots are not learning the same muscle-memory they use at in the pattern at Coupeville and around the carrier. OLF Coupeville is critical to carrier-based EA-18G aircrew training and should remain the primary field for FCLPs.

1.a. Thank You

Portland, OR 97201

The Navy has a unique mission provided by the EA-18 Growler aircraft and I for one want their continued training to continue. They have been doing this for over 40 years and I will support them for more years to come. The minimal impact by this Aircraft and their operations on the environment is returned 100 fold to the Navy and their readiness for our national defense. Thank you, Col. [REDACTED] USMC (Ret)

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1.a. Thank You

Oak Harbor, WA 98277-7247

I am a Navy Vet and husband of a retired Chief. We know how important it is to keep our pilots trained. We've seen airfields in other states get closed because some citizens do not like the Military. We realize that with the increase in squadrons and planes will come additional training. OLF is a vital part of that training. Landing on an aircraft carrier is the most dangerous act a pilot can do. Only the Navy has this responsibility for our national defense. We lived in base housing at Point Mugu airfield and our house sat parallel to the runway. F-4 Phantoms engaging their afterburners is very, very loud. We understand why they were doing this and knew it was part of their training. We support the Navy, the base and OLF here on Whidbey Island.

Langley, WA 98260

Because of lack of space in this comment form, I am submitting multiple partial comments. This is partial comment #4. In the "Purpose and Need" statement at the very beginning of the DEIS, the nub of the problem shows itself. You get answers to the questions you ask. In this instance, the question was not "where can we best train pilots of Growler jets for aircraft landings? Rather, the question is posed as "what is the impact of increasing the number of practice landings at OLF Coupeville? Wrong question yields wrong/irrelevant answer. It is clear from the introductory history that the Navy has ratcheted up uses and impacts at OLF Coupeville via a series of EAs and FONSI. While the claim of FONSI is challengeable, in each instance the Navy prevailed. We now see the cumulative impact of a series of actions, each of which is claimed to be below the threshold of significance but which cumulatively have an obvious significant adverse environmental impact. Which might explain why even the Navy didn't think it could get away with yet another FONSI. Rather than examining the impacts of just this last ratchet/step, it should be required that the entire series of actions leading up to this latest (and most likely not final) action be considered in the environmental analysis. While there have been EISs for individual sub-set proposals, no overarching programmatic EIS has been done. Why not? One of the many laws with which the Navy claims it must comply is the Safe Drinking Water Act of 1974. How does the contamination of the aquifer in the Coupeville/Prairie area comport with the Clean Water Act? The Navy accepts at least some responsibility for the contamination with PFOA and/or PFOS, and provides bottled water to a few of the most affected households, a sub-minimal response at best. It does not appear to take responsibility for cleaning up the toxic mess it has created, contrary to the Clean Water Act. It does not appear to examine the impacts on the Coupeville/Prairie aquifer of increased flights with the concomitant increased risk of accidents, leading to the need for increased fire response and training, which fails NEPA. There is a list of requirements for an FCLP site. Some of those are geographic in nature, which we agree represents a genuine limitation. Others are altogether spurious, such as the need for specific equipment or staff. If the Navy were serious about investigating alternative sites, it would provide the necessary equipment and/or staff, and not rule out sites for lack of them. One strongly suspects that OLF Coupeville lacked those amenities until the Navy installed them. It can do the same at any other site of its choosing. As for the 50 mile distance from home base, the Navy could just as well provide a home base near a chosen field or it could provide refueling. Again, these are not genuine limiting factors. DEIS Vol 1, p 2-14 "furthermore, moving all Growler squadrons to another installation would only move the potential environmental impact from one community to another community." Obviously, since inertia is a powerful force, it is easier to continue to impact the Coupeville/Prairie community than to make any changes, or even to consider them. This is contrary to NEPA and probably a whole slew of other laws. Each alternative proposed is rejected because it would require work, time, money, and change. The Navy obviously has no interest in investing any of those in reducing the impact on the Coupeville/Prairie community. The claim that Lewis-McChord and Gray are too far away demonstrates a lack of imagination and ingenuity. Lewis-McCord and Gray surely have refueling facilities. With all that touching and going, surely the pilots could figure out a way to stay down long enough to refuel before heading home to Whidbey Island . While

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.j. Property Values
- 2.a. Purpose and Need
- 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.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects

ambient light at night might be a problem, this should not deter daytime practice. And while it may expose a larger civilian population to the noise, elsewhere in the DEIS it is asserted that the noise is not a problem. Is you is or is you ain't? If its not a problem, it can be imposed on whatever population. If it is a problem, then the people of Coupeville/Prairie should not have to suffer it. The rationale for not buying land to build a new OLF elsewhere is downright fascinating. Can't justify the cost when there's a perfectly good OLF right there at Coupeville. But its not a perfectly good field. It is driving the civilian population crazy, degrading their health, impacting their children's educations, making their homes unlivable and unsalable, and incidentally poisoning them. The Navy's cavalier attitude toward the civilian population is both disgusting and very instructive. "We had to bomb the village to save it." This particular population is expected to give up their very lives and futures for the convenience and economic good of the Navy. Hard to blame them for resisting. p. 2-18 claims that constructing a new OLF in a different location, while reducing the impact to the Coupeville community, would result in "significantly more adverse impacts to the environment by result in significant new construction in another location." But NEPA does not allow for a balancing act. It requires that the actual impacts of the proposed action, not the comparative impacts of alternative actions. All of the drastic negative impacts which are listed as potential in the event of building a new OLF are currently being experienced by the neighbors/victims of the existing OLF Coupeville. t seems most curious that the Navy wishes to avoid imposing those impacts elsewhere, but is quite happy to continue imposing them at OLF Coupeville. . . . to be continued.

Langley, WA 98260

In the continuing comments . . . The rationale for not buying land to build a new OLF elsewhere is downright fascinating. Can't justify the cost when there's a perfectly good OLF right there at Coupeville. But its not a perfectly good field. It is driving the civilian population crazy, degrading their health, impacting their children's educations, making their homes unlivable and unsalable, and incidentally poisoning them. The Navy's cavalier attitude toward the civilian population is both disgusting and very instructive. "We had to bomb the village to save it." This particular population is expected to give up their very lives and futures for the convenience and economic good of the Navy. Hard to blame them for resisting. p. 2-18 claims that constructing a new OLF in a different location, while reducing the impact to the Coupeville community, would result in "significantly more adverse impacts to the environment by result in significant new construction in another location." But NEPA does not allow for a balancing act. It requires that the actual impacts of the proposed action, not the comparative impacts of alternative actions. All of the drastic negative impacts which are listed as potential in the event of building a new OLF are currently being experienced by the neighbors/victims of the existing OLF Coupeville. t seems most curious that the Navy wishes to avoid imposing those impacts elsewhere, but is quite happy to continue imposing them at OLF Coupeville. Chapter 3 purports to examine environmental impacts. Thus far I find a long discussion of flight patterns, and a lesser discussion of various noise studies and which metrics were used. All of the studies relate to impacts on humans. There appears to have been no attempt to assess the impact of the screaming jet noise on the wildlife which inhabits the prairie. OLF Coupeville happens to be situated in an area of remaining Northern Puget Sound Glacial Outwash Prairie. This habitat type was thought to be extinct until a small patch of unplowed prairie was discovered in 1997 at what is now Pacific Rim Institute. There has yet to be a comprehensive survey of non-human inhabitants of this prairie. Certainly there has been no attempt to assess the impact of jet noise on those species. There are studies elsewhere of the impact of noise on wildlife. For the most part those impacts are deleterious. Generally loud noises cause wildlife to leave off their feeding, foraging, tending of young, or other activities to bolt for safety. This costs them a great deal of energy and can often result in reduction in numbers as adults fail to secure sufficient food and young go untended. The DEIS is incomplete without an assessment of what species are present and what impacts present jet noise is having on those species, and then an assessment of the impact of increasing the noise. While the claim is made on p. 3-21/22 that it takes 40 years of exposure for 40 hours/week to induce hearing loss, those of us who experienced the rock concerts of the 1960s and 70s certainly did not do so for those periods, but exposure to those giant speakers was enough to cause significant hearing loss in a fair percentage of that age cohort. The claims are rather laughable on their face. Claims that non-auditory health effects are transitory ignore the fact that the noise, while episodic, returns time and again and again. Just as blood pressure begins to drop toward normal – another flight/landing/takeoff repeats the cycle of increased stress, blood pressure, etc. One has the impression that the Navy's reviewers have been cherry picking studies which "are not conclusive" rather than examining actual impacts on people on the ground suffering from this constant impact. The noise contours as presented on p. 3-26 are absurdly

- 1.a. Thank You
- 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.l. Bird Migration
- 10.m. Impacts to Marine Species and Habitat
- 12.f. Economic Hardship and Impacts
- 12.k. Compensation to Citizens for Private Property
- 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.l. Points of Interest
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area
- 9.b. Native Food Resources and Tribal Fishing Grounds

inaccurate. We hear complaints from Greenbank to the San Juans to Jefferson County. I personally experienced sitting in the living room of a friend on Camano Island late on a chill May evening (with windows closed), and having our conversation, as we sat side by side, drowned out by jets at OLF. Quite inconsistent with the noise contours claimed in the DEIS. Please correct your noise contours to reflect reality. Alternative facts are not acceptable. The chart of "average number of (interrupted indoor speech) per daytime hour" is simply not credible. On p. 3-31 is that statement that local jurisdictions are expected to limit the lives of those who live near Ault Field and OLF Coupeville "to enhance health, safety, and welfare." But it is the Navy and its operations which are impacting the health, safety, and welfare of the residents of the area. It is incumbent upon the Navy to constrain its operations to respect the lives of residents, not for the residents to constrain their lives for the convenience of the Navy. This particular paragraph, and many others throughout this document demonstrate that the Navy expects the civilian population to accommodate itself to the needs of the Navy, rather than vice versa. This is not acceptable. The Navy is a part of the armed forces of the United States and exists to protect the civilian population. Very high on its list of priorities should be the need not to adversely impact that civilian population. FCLP practice at OLF Coupeville does in point of fact have a significant adverse impact on the health, safety, and welfare of the civilian population of much of the northern Puget Sound region, far beyond just the screaming impacts on residents of the Coupeville/Prairie area. It is for the Navy to avoid or reduce those impacts, not to increase them. The chart of "annual average outdoor daily daytime events per hour" on p. 3-38 is, based on personal experience, a complete crock. I work outdoors at Ebey's Landing/Ebey's Prairie and have to leave when the jets begin to fly because of the intensely painful noise. This has caused me to lose work. I am certainly not the only one in that position. The chart does not reflect this reality. At p. 3-43 there is a discussion of bird/animal aircraft strike hazard. There is much discussion of safety for the jets and their pilots. There is no discussion of the impacts on the bird populations of such strikes. At a minimum there needs to be a discussion of the number of incidents, a list of the species involved, and the impact these strikes have on populations of those species. On p. 3-45 we learn that the Navy engages USDA's Wildlife Services to kill birds considered a hazard to flight operations. At a minimum the DEIS needs to list the number of occasions when Wildlife Services has killed local wildlife and how many individuals, of what species, have been killed. p. 3-49 states that noise impacts are expected to be the primary negative environmental and human health associated impacts. Contaminating the aquifer with known carcinogens is certainly of equal impact. Perhaps further in this document there is discussion of that. p. 3-72 provides a chart of potentially impacted recreation facilities. There are several Washington State Park units missing from this list, including Joseph Whidbey State Park and Fort Ebey State Park. There are a number of Island County park & trail units missing as well. This is an incomplete list, from which we may conclude that potential adverse impacts are under-represented. p. 3-98 discusses American Indian traditional resources. Glaringly absent from this discussion are the food resources of the Coupeville/Ebey's Prairie/Smith Prairie area. These prairies provided a great many food sources for native peoples of the region, primarily *Camassia quamash*, *Lomatium nudicaule*, *Lomatium utriculatum*, *Fritillaria affinis*. The *Quercus garryana* after which Oak Harbor was named were said to have been planted by native peoples to provide them with a source of nutrient rich acorns as they traveled. No discussion of traditional resources is complete without a discussion of the food resources. The Navy has kept OLF Coupeville in a farmed condition, which has prevented restoration of native

prairie and those native food sources. There is a lengthy discussion of federally listed threatened and endangered species, but only in the context of proposed construction at Ault Field. This is an improper piecemealing. There needs to be a discussion of these species in context of the entire proposal. One example: *Castilleja levisecta* occurs in a number of locations around OLF Coupeville. Work on that species could well be curtailed by increased jet operations at OLF, as workers generally do not want to be subjected to the torture of those overflights. While there is lots of interesting information about Important Bird Areas and Species of Local Importance, all of these, as above, are discussed only in relation to proposed construction at Ault Field and not in the context of the potential impacts of the proposed actions as a whole. I do not see any discussion, for instance, of the impacts of jet flights on large aggregations of migratory birds. There is a very long and interesting discussion about the presence of various fish and marine mammal species. And there the matter ends. There is no discussion of the potential impact on, among others, the various whale species, of jet noise. Whales, as we presume the Navy knows, live by echolocation. Interference with that function is deadly. There appears to be no discussion of the potential impact of jet noise on whale echolocation. This is most likely because the DEIS has been improperly segmented. Instead of considering the impacts of the entire proposal, in many parts of the document the only impacts considered are those of new construction at Ault Field. NEPA requires that ALL potential impacts of the ENTIRE proposal be considered. This document fails that requirement. Please rewrite and reorganize to include ALL potential impacts of the ENTIRE proposal.

Langley, WA 98260

p. 3-145-146 discusses groundwater and acknowledges contamination of the aquifer near Oak Harbor. There is no discussion of the present condition of the groundwater in that area. There is also no discussion of the contamination of groundwater in the OLF Coupeville area. One presumes that the fact that the Navy is now supplying at least 6 households with bottled water implies an acknowledgement of the gravity of the situation and the potential adverse health impacts on the residents whose wells have been contaminated. News reports are to the effect that the Navy is expanding its testing. There needs to be a discussion of the specific contaminants in both cases, remedial actions – beyond closing off wells and/or providing bottled water – and proposals to make whole the impacted parties. PFOAs, the contaminant in fire fighting foam found in wells near OLF, is known to be absorbed via dermal contact. That leaves the affected residents forced either to bathe elsewhere or to subject themselves to a known toxic. That is unacceptable. It has also made it impossible for the affected parties to sell their homes and move elsewhere. The Navy has trapped them in a situation which will with a fair degree of certainty cause them bodily, mental, emotional, and financial harm. That is unacceptable. The situation needs to be discussed in the EIS and it needs to be remedied as soon as possible. Since there is no discussion of the OLF contaminants, there is no discussion of the impacts of those contaminants on wildlife in the area or on crops raised in the area. Again, this lack needs to be remedied. P 3-147 discusses the abysmal water quality in ditches around Ault Field and proposed BMPs to improve stormwater quality. One of those BMPs is to divert contaminated stormwater into the sanitary sewer system. That system is not capable of handling aromatic hydrocarbons. This particular BMP is at odds with the very next one which says that storm drains should not be used to dump or discharge any materials or chemicals. Stormwater BMPs obviously need some serious reconsideration. Not mentioned at all is the large stockpile of toxic firefighting foam. If that is used in future it will exacerbate contamination of soils and surface and groundwater. It should be disposed of in a safe manner. What will that safe manner be? When, where, and how will this be accomplished? On p. 3-147 is a discussion of floodplains, mentioning that high winds and high tides combine on occasion to cause flooding from Dugualla Bay. While the current federal administration may not believe that climate change and sea level rise are real, it would behoove the Navy to consider the impacts of sea level rise in relation to Dugualla Bay and Ault Field. While the ditch network may handle the current storm surges, it is fairly predictable that it will fail as sea levels rise. Please discuss how such a rise would affect operations.

1.a. Thank You

11.c. Marine Waters and Sediment

11.d. Per- and Polyfluoroalkyl Substances

15.b. Potable Water and Wastewater Capacity

Langley, WA 98260

We have extensive comments, and find there is no way to attach a document. This makes commenting awkward. One could almost draw the conclusion that actual substantive comments are not wanted. Nevertheless, given the constraints of the medium, I will add comments as I can. The report below is by [REDACTED] a sound engineer, who reviewed the DEIS. Please take his comments seriously and withdraw the DEIS for further work. We particularly wish to see responses to [REDACTED] various issues. Summary 1. The noise model used for the EIS was not verified by ground testing. 2. The draft EIS relies on the DNL, an outdated noise metric that fails to adequately predict the effect of aircraft operations on Whidbey Island. 3. The draft EIS uses other metrics which are incomprehensible to the public when they could have instead used easily accessible contours of actual effects, such as sleep disruption, speech interference and annoyance. 4. The EIS underestimates nighttime awakenings by using a single event metric instead of a multi-event metric. 5. There is a known negative association between chronic aircraft noise and cognition in schoolchildren. Because of this, the EIS should provide speech interference and startle response data that would be of use to parents and educators. 6. The Navy's EIS fails to calculate speech interference effects on first responders and other vulnerable populations. 7. The EIS rejects established science showing a relationship between aircraft noise and cardiovascular disease. 8. The EIS incorrectly dismisses annoyance caused by structural vibration. 9. Glossary of terms Details 1) The Navy has made no effort to demonstrate the accuracy of its noise model. The only on-the-ground acoustical measurements have been done by third parties and have measured DNL levels substantially above those listed in the EIS. This could be due to a poor model, or to incorrect input. Only ground measurements can clear up the discrepancies and test the accuracy of the model. Additionally, the DNL noise metric, which forms the foundation of the Navy's analysis, is typically used to measure steady-state noise, such as highways and airports that operate 365 days of the year. A full analysis of an intermittent noise source such as OLF in Coupeville should also include the DNL during actual periods of use, rather than averaging them over times when the facilities are idle. The DNL model is also a poor choice because it only works well at the ends of runways. As proximity to the airfield decreases, the DNL's accuracy decreases. Since much of the noise impacts measured at OLF occur on deeply curved flight paths, ground testing and better metrics should be used. 2) The DNL metric also fails to account properly for sleep cycles and early-evening activities. For this reason, the DNL has been abandoned by the European Union and California as better, more accurate metrics have become available. (For those unfamiliar with the DNL, a brief glossary is at the end of this response.) Specifically, the DNL only applies a 10 dB penalty after 10:00 p.m. This does not adequately address the needs of those with early bedtimes, such as children. In addition, quality of life considerations also compel a metric that provides a penalty to early evening as well as nighttime hours. For these reasons, the LDEN and CNEL are better, more accurate metrics for the EIS since they apply a penalty to evening hours as well as nighttime hours. 3) The public does not understand the DNL, nor is it relevant to their daily lives. The DNL has mainly been adopted for land use planning purposes—not to fully inform the public of social impacts of aviation noise. In addition to noise contours the EIS should also include contours of effects. To properly inform the non-technical

- 1.a. Thank You
- 2.e. Public Involvement Process
- 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.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

public, the Navy should prepare contours of the following projected effects: • Single and multiple nighttime awakenings • Minutes of daily speech interference • Increased hospital admissions due to cardiovascular disease • Locations where structural vibrations will occur • Locations where permanent and temporary threshold shifts will occur The Navy should also prepare contours of annoyance response, based on the Schultz curve (after it has been adjusted for aircraft noise). This will provide additional social science data easily accessible to the public that will more accurately describe quality of life in areas affected by noise from OLF. 4) The Navy's estimates of sleep disruption are inadequate and should be recalculated. Studies have shown that the probability of arousal is increased by multiple events of the same noise level rather than single events. Specifically, an SEL of 80 creates roughly three times the chance of awakening when it occurs five times during the evening: Thus reporting the impacts of single event on sleep understates the effects. Since training at OLF is by its very nature a multi-episode event, the data provided by the EIS is inaccurate. 5) Chronic exposure to aircraft noise has been shown to negatively affect cognition in primary school students. Properly measuring speech interference and startle response in affected classrooms would allow educators to measure time lost to aircraft noise and plan accordingly to increase the school day or school year. Better measurements of noise in affected classrooms would also provide parents with an opportunity to review the data and make an informed decision to transfer their children to quieter schools or petition lawmakers to provide additional soundproofing. The EIS fails to provide parents and educators with this information. Measuring speech interference in "incidences per hour" provides no useful data. At schools located within the impacted area the duration of speech interference events should be expressed by the L_x of the interfering noise during school hours (L being 55 dBA measured outdoors, assuming the standard 15 dBA open window attenuation, and x being the percentage of each hour that 55 dBA is exceeded.) Startle response should also be documented by using the L_{max} for each overflight on days when the nearest airfield is in use. 6) Points of interest in measuring speech interference should include all medical facilities and nursing homes, as well as locations where first responders are housed such as fire stations and police facilities. 7) The EIS rejects the relationship between aircraft noise and cardiovascular disease for lack of a causal relationship, even though over three decades of established science has shown a clear relationship. A recent pair of studies in the UK and the US found an association between airport noise and increased hospital admissions due to stroke, heart attack and cardiovascular disease. Specifically, each 10 dB increase in noise level within the DNL 65 contour produced a 3.5 percent increase in hospital admissions for cardiovascular disease. The Navy must acknowledge this relationship between aircraft noise and cardiovascular disease and properly estimate increased mortality rates in the Whidbey Island complex due to current operations, as well as projected operations. 8) The draft EIS only addresses the effects of aircraft-induced vibration on the structural integrity of buildings. There is, however, a strong annoyance/startle reaction to noise-induced vibration at work and at home. These effects can be easily predicted using a C weighted L_{max} . 9) Glossary dB A and C weighting. A decibel or dB is a measure of loudness. dBA measures loudness as it is experienced by humans, dBC or "C weighting" gives more weight to low frequency sounds that humans don't hear particularly well. DNL DNL stands for Day Night Level. It is an average of noise levels in a 24 hour period, but a penalty is applied to noises between 10:00 p.m. and 7:00 a.m. because nighttime noise is thought to be less desirable. LDEN and CNEL These two are like the DNL, except that they also apply a penalty to noise in the early evening

hours of 7:00-10:00p.m., but this penalty is not as harsh as the penalty that kicks in after 10:00 p.m. Lx This number tells you how many minutes per hour an arbitrary noise level is exceeded. Lmax This is the highest noise level registered in a given period. SEL A method of measuring short duration noise by compressing its energy into a small time interval such as one second. -End- [REDACTED] was president of a consulting firm that was hired by the State of Minnesota to evaluate its environmental noise standards. He now owns a noise control business in Clinton, WA

Langley, WA 98260

Because of the exceedingly limiting format in which comments are allowed, I am not able to present you with the actual report, but I wish to draw your attention to the report Invisible Costs, the \$122 million Price Tag for the Naval Air Station Whidbey Island. by Michael H Shuman. The report can be found at <https://sustainable-economy-collaborative.com/report/> Please include the body of this report in the record. I request that before the EIS for the proposed increase in flights at OLF Coupeville is finalized, the relevant parties read and respond to this report. It documents the adverse economic impact of the presence of the Navy at NAS Whidbey, including its proposed increased flights at OLF Coupeville. While an EIS is intended to focus on the environmental impacts, the economic impacts on the residents of the community must also be considered. In this instance those impacts are severe and predicted to increase. The fact that the Navy has chosen its range of alternatives in the limited way it has - without consideration of any alternate site for the touch and go landing practice - invalidates any conclusions. The equivalent is "would you prefer to be hanged or shot?" The answer in this instance is "neither." But that alternative is not being offered by the Navy. That makes the entire 1500 page exercise moot and meaningless. No significant alternative to the intended action is considered - merely variations on a single theme. This is contrary to NEPA. Please revise the list of alternatives to be considered to include alternatives in locations other than Whidbey Island.

- 1.a. Thank You
- 12.b. Invisible Costs
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives

Langley, WA 98260

The need to submit multiple separate comments does precious little for coherence, but as the Dutch say, you have to row with the oars you've got, so I will continue with this awkward format. In my first posting I pasted in the comments by sound scientist Brian Lowey. I would like to add to his information, as now the Washington State Dept of Health has also weighed in on the adverse health impacts of the noise generated by the Growlers. That report concludes "the current bodyof scientific literature suggests that the noise levels similar to those reported from the NAS Whidbey Island Complex pose a threat to public health." Even the Navy's own study acknowledges the rather obvious fact that noise, especially noise at the levels generated by Growler jets, has adverse impacts on children's abilities to concentrate and learn. Given that all the schools in Coupeville are within a short walk of OLF Coupeville, the very specific impacts on those schools and their students must be considered. To date that has not occurred. It is painfully sad that the Coupeville School District has been intimidated into holding silent and failing to comment on the DEIS. That does not mean there will be no impacts to children in the learning environment. It only means that those whose charge it is to advocate for the children under their care are failing to speak up. The impacts are real and significant, in spite of the School District's silence. A further quote from the report, which evidently has been submitted by the State Health Dept for the record, "However, noise levels similar to those reported from NAS Whidbey Island Complex described in all recent reports pose a threat to public health." I am a member of the public whose health is being threatened. I am not amused. I write on behalf of the +/- 500 member households of Whidbey Environmental Action Network. None of them are amused either. The conclusion in the DEIS that there have been "no studies that definitively show a causal and significant relationship" between jet noise and health" is facially incorrect. The studies exist. The relationship has been demonstrated. Those studies need to be acknowledged and their conclusions taken into account in analyzing the adverse impacts to public health from all of the proposed alternatives.

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests

Port Townsend, WA 98368

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 comprehend and prepare comments in a timely way. There is much to consider, and others have already done this. It is to them I turn in complete agreement. I have read completely all the following statements and more; with these I agree and add my signature, with additional comments at the end of this document. 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) 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

- 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.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 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
- 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

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. Another thing not accounted for in the analysis is the harmonic interference and amplification of the noise of the jet engines when operated in tandem; this research on static mounted jet engines is without any merit whatsoever if it does not mimic true conditions in the theater of operations, and on the equipment as intended for use.

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 contend 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. 28. Effects of electromagnetic radiation: Nothing in this document address the long term exposure of the citizens, domestic and farm animals, and wildlife to the electromagnetic radiation from the operations of these aircraft. As noted in Professor Martin Pall's comments to the United States Forest Service in response to the Navy's proposal for the Electronic Warfare Range on the Olympic Peninsula, the research from the Navy itself indicates knowledge of the dangers of EMF but the subsequent documents ignore the evidence. The evidence, however, is found in hundreds of peer reviewed scientific journals and unanimously points to the seriousness of exposure to low levels of emf over long periods of time. The Navy conveniently ignores the evidence and would have us believe that it is harmless if we cannot see it. The effects disrupt the navigational systems of migratory birds and amphibians, insects (including important pollinators such as bees) and even plants, whose biological processes include some of the same cellular operations that are affected by emf exposure in animals. This is the alteration of the operation of the voltage-gate calcium channels that have been linked to serious long term health effects in animals that also can occur in plants as well. Thank you for considering these comments. Sincerely, [REDACTED] Port Townsend Washington State.



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 _____
- 3. Address [REDACTED] Anacortes 98221
- 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

Fidalgo Is. is crucial for recreation + is inadequately mapped. Most of the public park acreage is ignored - especially for trails + fishing lakes north of the bridge. Pass Lake well known for fly fishing, Campbell Lake, Erie + Heart for teaching children how to fish. Few stock these.

SR 20 between Bridge + Sharpes Corner will be dangerous to turn left on + off of after the Roundabout. Sharpes Corner eliminates gaps. Now 17000+ vehicles use that stretch - what will hundreds more mean? WSDOT must be pushed into thinking.

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
- 14.b. Vehicle Collisions and Safety
- 2.e. Public Involvement Process
- 7.d. Recreation and Wilderness Analysis and Study Area

anacortes 98221

A2 Anacortes American Wednesday, December 7, 2016

goanacortes.com

State's 2017-2020 transportation plan up for review

The state Department of Transportation is seeking public review and comment on the annual statewide project list included in the draft 2017-2020 Statewide Transportation Improvement Program.

The complete project list, available on the DOT website, is the result of months of collaboration with local and regional transportation plan-

ning organizations, according to a DOT news release. The program includes federally funded transportation projects as well as regionally significant state and local projects.

Among the projects for Fidalgo Island are a single-lane roundabout at the intersection of Ship Harbor Boulevard and Highway 20 in 2019 for nearly \$1 million, a replacement

building at the Washington State Ferries terminal starting in 2017 for close to \$1.4 million, and ADA improvements at the facility for about \$200,000.

The Sharpes Corner improvement project is in the plan with a total estimated cost of \$13.4 million for the planned roundabout.

The public can make com-

ments on the draft document through Friday, Dec. 16. Written comments should be mailed to Nancy Huntley, WSDOT, PO Box 47390, Olympia, WA 98504-7390, emailed to Huntlen@wsdot.wa.gov, or faxed to 360-705-6822.

Comments received will be sent to local or regional planning organizations for consideration.

The list includes more than 1,300 improvement projects using \$2.9 billion in federal funds, and about 125 projects using \$1.5 billion in Connecting Washington funds. Projects include pavement preservation, roadway widening, bridge replacements and repairs, signal systems, safety enhancements, bicycle and pedestrian facilities, and transit facilities.



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] MD
- 2. Organization/Affiliation resident of affected area
- 3. Address [REDACTED] Port Hadlock, WA 98339
- 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

Please see my comments on the back of this page - I wanted to type them for legibility

- 1.a. Thank You
- 12.h. Tourism
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 4.a. General Noise Modeling
- 4.r. Nonauditory Health Effects

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

The noise of the Growler is a form of pollution devastating to the Pacific Northwest. The majority of us live here because we need the quiet unspoiled stretches of the Olympic National Park and Forest, and other protected land. We need it every bit as much as we also need an excellent Navy. The air space and atmosphere have to be protected just as much as the land and water and people. It's obvious the Military so far, really doesn't care a bit about the impact of noise on us or anyone else. They are paying lip service to the issue, rather than truly admitting that this is a situation of competing needs that are all equally valid.

Another need that is in the equation that they should care about is the impact on tourism. Tourism is a livelihood and if we can't make a living, we can't pay the taxes that the military needs. Tourists come here for the natural environment; Growlers aren't natural and can't be ignored. The sound is terrifying, overpowering, and disturbing enough to keep people from coming here. I've heard it once, while hiking on the Olympic Peninsula and I'd hoped never to hear it again.

Veterans, and in fact, military personnel on leave, need peace and quiet. They need a place to come where there are no reminders of war. There is war and there is peace and if war planes intrude on the peacefulness of the Pacific Northwest, they ruin it. Veterans, soldiers, sailors, marines, airmen, citizens, the trees that supply our oxygen, the animals and fish that are part of our own lifecycle in ways we all learned about in grade school, families vacationing here, and those who earn a living serving the vacationers – all of us will be impacted horribly by the noise those Growlers produce.

If the Navy thinks its needs matter above all others, then think of two things: tax money from tourism dollars and the sanity of its own servicemen. Don't destroy the livelihoods and lives of the very people you are trying to protect.

Langley, WA 98260

- 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).

Langley, WA 98260

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

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

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").

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

1.a. Thank You
4.I. Points of Interest

I live on Fox Spit, south Whidbey Island. I hear the growlers all the way down here. I heard them the other evening after midnight - all my windows and doors were closed and I could still hear them.

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

Oak Harbor, WA 98277

1.a. Thank You
3.c. Military Training Routes

The Coupeville OLF is 5400 ft. in length. In DEIS Appendix H it is stated that regulation for FCLP is 8000 feet. Shouldn't the DEIS include bringing the OLF up to current regulation for safety of pilots and residents? What is the impact of this construction?

Oak Harbor, WA 98277

1.a. Thank You
5.a. Accident Potential Zones

The 2005 AICUZ did not require APZs at the Coupeville OLF because usage was supposed to be under 5000 operations per year. In recent years over 5000 operations have been conducted yet there are still no APZs, as required by regulation, for the OLF. The DEIS least alternative for the OLF is 8300 operations per year. Yet still there is no APZ drawn for the OLF. Isn't this already a violation? Shouldn't it be corrected within the DEIS? Thank you

Oak Harbor, WA 98277

1. Increase from 6,100 to 35,100 at OLF Coupeville (EIS Alternative indicates 600% increase) I want the final EIS to include geographic alternatives to increasing EA-18G training entirely at Ault Field and OLF Coupeville. Please include both environmental and economic data for all possible alternatives. 2. Real Rather Than Modeled Decibels (draft EIS levels inconsistent with Federal NPS study) I want the final EIS to be re-written using actual rather than modeled data, to more accurately predict economic and environmental impact of increased EA-18G training on local communities. 3. Water Quality Assurance (Environmental Hazards not included in draft EIS) I want assurances included in the final EIS that all water contaminants at Ault Field and OLF Coupeville are below EPA thresholds (including perflourooctane sulfonate and perfluorooctanoic acid below 70 ppt) prior to any increase in EA-18G numbers. 4. Accident Potential Understood; Residents Compensated (EIS Incomplete) I want the final EIS to propose an Accident Potential Zone around the OLF, with adequate compensation to Local Governments for all necessary downzoning prior to any operational increases at OLF Coupeville. Thank you!

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.k. Range of Alternatives
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 5.a. Accident Potential Zones

Oak Harbor, WA 98239

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

Please analyze thoroughly alternatives OTHER than 100% of all flying on Whidbey. This was not done in the DRAFT EIS, as requested in the Scoping process. For example, how about sending aircraft to China Lake for a couple weeks at a time? Do 80% of FCLPs at China Lake and 20% at Oak Harbor. Save our Children! Thank you

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Oak Harbor, WA 98277

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 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. 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 training alternatives which should be analyzed in the DEIS for NASWI: NAS Lemoore (CA)* NAF El Centro (CA)* NAWS China Lake (CA)* NAS Jacksonville (FL) NAS Oceana (VA)* MCAS Cherry Point (NC)* NAS Meridian (AL) NAS Fallon (NV) Mountain Home AFB (ID) NAS Kingsville (TX) NAS Corpus Christi (TX) Ellsworth AFB (SD) Regional Airfield options for FCLP practice: Joint Bass Lewis-McCord (Tacoma)* Grey Army Airfield (Tacoma)* Grant County (Larsen AFB) (Moses Lake) Snohomish County (Paine Field) (Everett)* Bremerton National (Bremerton)* Skagit Regional (Burlington)* (only 100' width) 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.

1.a. Thank You
3.c. Military Training Routes

-----Original Message-----

From: Padgett, Lisa M CIV USFF, N46
Sent: Monday, April 17, 2017 2:39 PM
To: [REDACTED]
Cc: Cecchini, Joseph D CIV OASN EI&E; Meyer, Jennifer S CIV NAVFAC NW, AM;
Mike.Schanche@mail.house.gov; Welding, Mike T CIV NAS Whidbey Is, N01P
Subject: RE: [Non-DoD Source] Who do I talk to Next about Safety Concerns?

Ms. [REDACTED]

Thank you for the information. Your questions and comments have been catalogued as a comment received on the Draft EIS. All public comments received on the Draft EIS are taken under consideration and are used to improve the NEPA analysis.

I invite you to review the Final EIS when it is published later this fall. As a member of the project mailing list, you will receive a post card notifying you that the Final EIS has been published. At that time, you will have the opportunity to review the updated analysis and to see how your question was addressed.

Very Respectfully,
Lisa Padgett

-----Original Message-----

From: [REDACTED]
Sent: Thursday, April 13, 2017 6:04 PM
To: Padgett, Lisa M CIV USFF, N46
Cc: Cecchini, Joseph D CIV OASN EI&E; Meyer, Jennifer S CIV NAVFAC NW, AM;
Mike.Schanche@mail.house.gov
Subject: Re: [Non-DoD Source] Who do I talk to Next about Safety Concerns?

Ms. Padgett,

Sorry for being unclear. It isn't ME who says the Coupeville OLF is unsafe. It is the Navy. I have Navy-generated reports from the 60s, the 80s, and the 90s specifically saying the OLF does not meet established criteria for FCLP operation. No improvements to the airfield have been made to address the reported concerns since those reports were generated, to my knowledge.

It's easy sometimes to forget history. You say the field has been safe for decades. Here is NAVFAC report generated a year or two after 3 EA-6B pilots were killed practicing FCLPs at the Coupeville OLF, quote:

Although the field is operationally important as a carrier qualification field, facilities at OLF Coupeville do not now meet criteria established for current FCLP operations levels. The following improvements are required:

- a. Extend runways
 - Runway 14/32 from 5,400' to 8,800'
 - Taxiway from 4,866' to 8,800'

- b. Strengthen existing pavement
- c. Improve roads and drainage
- d. Acquire land in fee (APZ A lands outside the base) 71 acres.

end quote.

These recommendations reflect similar ones regarding the Coupeville OLF from the 60s. In the 90s the field was disqualified again in the EIS prepared to bring Navy Legacy F-18s to the West coast.

I've never personally flown an EA-18, so I don't know it's capabilities from Adam. But the Boeing spec is you can land one in just under 4000' in non-emergency situations. Of course without a tail hook. That's why the Coupeville OLF is used only for FCLPs - it isn't long enough to safely land or take off, without prior Command approval, etc.

Most OLFs are used predominately for FCLPs. Are you aware that no other active OLF within DoD is anything close to length of OLF Coupeville? My concern is that these reports have been generated and are now forgotten, and that those individuals now preparing the EIS are unaware of the shortfalls, which becomes a safety issue for the instructors and pilots. Have you personally ever seen the Coupeville OLF? Are you aware that a state highway currently goes right through the supposed Clear Zone?! Have you seen the 1987 safety waiver under which the field still operates?

Finally, I don't know if you intentionally ignored my question regarding cost estimates for extending the runway and other required airfield improvements, and costs associated with necessary purchases in fee and restrictive easements as required for newly-established APZs, as recommended in the DEIS. But if there is someone who has this information, or is developing it, I would appreciate their contact info, if it isn't too much trouble.

Thanks again for your responsiveness. Again I'm just trying to be assured that the entire plan to single-site the Growlers as NASWI isn't reliant on an OLF facility the Navy has repeatedly graded as "not meeting criteria for current FCLP operations."

██████████
██████████
Coupeville WA
360 672-2331

On Thu, Apr 13, 2017 at 11:51 AM, Padgett, Lisa M CIV USFF, N46 <Lisa.Padgett@navy.mil> wrote:

Ms. ██████████

Thank you for your continued interest in this project. As you know, the Navy accepted public comments on the Draft EIS through February 24, 2017. The Navy will be addressing all public comments received on the Draft EIS, such as your comment regarding runway length at OLF Coupeville.

I can confirm that this comment regarding runway length has been cataloged and will be addressed by Growler EIS team members. The comments and their responses will be provided in an appendix of the Final EIS when it is published later this year.

If you have any questions about current operations and safety, please contact NASWI Public Affairs/Mike Welding at (360) 257-2962 <[tel:%28360%29%20257-2962](tel:283602920257-2962)> and NASWI Community Liaison Planning /Jennifer Meyer at (360) 257-8787 <[tel:360%29%20257-8787](tel:3602920257-8787)> .

Please note that aircraft have been operating safely at OLF Coupeville for decades. OLF Coupeville is primarily used for field carrier landing practice, and does not require the additional length as required by aircraft for general operations such as routine takeoffs and landings. It is important to understand that the Growler can safely land at OLF if necessary as the runway does have a system called an arresting gear. Arresting gears are used on aircraft carriers for all landings other than rotary-wing aircraft, and at airfields for emergency landings. Navy jets have a tail hook that is lowered to catch steel cables across the runways that are part of the arresting gear system.

Very respectfully,
Lisa Padgett

-----Original Message-----

From: [REDACTED]
Sent: Thursday, April 13, 2017 10:32 AM
To: Padgett, Lisa M CIV USFF, N46; Cecchini, Joseph D CIV OASN EI&E; Meyer, Jennifer S CIV NAVFAC NW, AM; Mike.Schanche@mail.house.gov
Subject: [Non-DoD Source] Who do I talk to Next about Safety Concerns?

Ms. Padgett,
Great - sorry for the inconvenience - I received the message this time.
It is difficult to follow this process for a farmer from Coupeville...

The 4300 DEIS comments are sorted and then, I assume, sent to key decision makers for response.

Can you tell me who within USFF, or EI&E, is responding to comments received about safety concerns that exist at the Coupeville OLF? Specifically the short runway for FCLPs (5400 feet rather than 8000) and the 1987 safety waiver (inadequate End and Clear Zone, etc.) that is still in effect?

Or perhaps you can direct me to inquire elsewhere. I want to be sure that the entire premise of single-siting the EA-18s at NASWI is not based on performing FCLPs at a runway that was deemed unsafe by NAVFAC in 1986 (NASWI Masterplan Update, 1986, p XI-22), and has not been updated to current safety standards since that time.

As an aside, I read the Congressional testimony (Rear Admiral Michael Moran) last month to the House Armed Services sub-committee (Naval Aviation Strike Fighter Issues and Concerns) regarding the significant increase in 2016 in physiological episodes with the EA-18s. I believe the least we all can do to support our pilots is to minimize risk by letting them practice FCLPs on safe, adequate airfields...

Are all costs for Coupeville OLF improvements, as well as estimates for acquiring property in fee and/or in restrictive easements for the yet-to-be-determined APZs at the OLF, included in the EIS or in any other document I might access?

Again, I appreciate all of you being so responsive to my inquiries - above and beyond the call - and I look forward to your response.

Cheers,

██████████
██████████

Coupeville

1.a. Thank You

Seattle, WA 98109

Hello, I am writing to voice my concerns about the Growler expansion on Whidbey Island. I believe this expansion will negatively impact the community in the surrounding area in many ways. This area is a beautiful natural place that is quiet and peaceful. The increased air traffic will shatter this peace. The children in the area will be negatively effected by the noise pollution. The adults in the area will be also. Please reconsider this increased air traffic. Please be a good neighbor to your fellow citizens. Thank you, [REDACTED]

1.a. Thank You

La Conner, WA, WA 98257

I am frankly amazed that the Navy -- a major component of the defense of these United States -- is obligated to go through the nonsense and cost of hearing public comments and the filing of a Draft EIS, all at the expense of the taxpayer, in order to add a few more airplanes to an already large existing inventory at the primary electronic warfare and ASW Naval Air Station on the west coast. I have lived in La Conner for the past 20+ years, close to the approach/climb corridor to one of the Air Station's two major runways (7/25), and the base is only about 7 miles away as the crow flies, i.e., much closer than anyone living in the San Juan Islands (approx. 14 miles minimum). In my opinion, the "Gowler" noise isn't that bad, it certainly isn't continuous, and what little there is on occasion, you DO get used to -- even the occasional night ops and 'burner noise on takeoff that can be heard when the wind is "right".. I actually seem to be more aware of jet noise when I'm in Seattle and hear commercial jets heading into or departing SeaTac as they pass over the city almost continuously. Even if the airplane is not directly overhead, the noise reverberates off buildings. A lot more population is under the flight path of these jets into and out of SeaTac than will ever be case at NAS Whidbey Is., so I'm wondering who really has the right of complaint here?

Seattle, WA 98103

I oppose EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island due to the effects from loud noise that would result including hearing loss, increased stress hormones, cardiovascular disease, impacts on migrating bird paths, and behavioral/psychosocial impacts.

- 1.a. Thank You
- 10.I. Bird Migration
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

Increasing the number of Growler operations at the OLF will have long-lasting, detrimental effects to the health and economic viability of Central Whidbey communities, residents, and businesses. For example, Section 4.3 of the EIS requires a 15,000-foot clear and accident zone for operations over 5000/year. How will the Navy fund the required zone that would necessitate moving/purchasing the only island's only hospital, Coupeville three schools, numerous farms and businesses, residences, and historic buildings within the OLF zone? Per Appendix H, the Navy will also be required to fund an expansion of the current OLF runway to meet its own regulations at an estimated cost of \$26 million. Ebey's Landing National Historic Reserve, which was protected with government sponsorship, lies within the OLF flight zone. Agriculture, tourism, marine and terrestrial wildlife, water quality will all be negatively affected by the projected increase of activity related to the OLF. The increase in Growlers stationed on the island also increases the security risk substantially from both internal malfunctions/mishaps to external attacks. Consideration of alternative, less densely populated sites for Growler aircraft operations has not been documented. The numerous downsides of increasing the Growler operations on Whidbey Island far outweigh any potential benefits.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 12.c. Socioeconomic Impacts
- 12.k. Compensation to Citizens for Private Property
- 12.m. Education Impacts
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 3.a. Aircraft Operations
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

1.a. Thank You

Freeland, WA 98249

This area is a jewel of Washington state and would be destroyed by so much noise. The sweeping pairs that to beach that looks out across to the mountains draws tourist from all over who fall in love with the beauty area and charm of the town and community. Please do not scrfice this special place. Please to not go through with this expansion which would destroy this area.

Freeland, WA 98249

The Town of Coupeville and Ebey's Landing are irreplaceable gems of WA State for a variety of reasons, none of which are compatible with the proposed increase in touch-and-go training at OLF Coupeville. The large and small farms that characterize the area rely on safe air, water and tolerable working conditions. Crockett Lake is a critical stopover on the Pacific Flyway, providing refuge to hundreds of thousands of waterfowl annually, that need this place to rest on their journey. The people and businesses of Coupeville rely on the quiet rural character of this area for their viability. All of these qualities are incompatible with the proposed increase in touch-and-go training at the OLF. The residents of Coupeville, old and young, should be allowed to enjoy the place and not be subject to constant auditory harassment. The scores of tourists that visit the area come to experience the quaint village, the scenic pastoral beauty and the wild nature, but will cease to come and visit the parks, walk the trails and beaches, and spend their dollars at local businesses if the place is rendered a sacrifice zone for Navy training. Moreover, the likelihood of training accidents will dramatically increase under the scenario hinted at as preferred in the EIS, which constitutes a direct threat to life of our friends and neighbors. Further, the EIS is flawed in starting under the premise that stationing the entire fleet of E-18 Growlers is inevitable or wise. In the opinion of many, it is neither. The people of Whidbey Island cannot and will not accept the conclusions of the Navy's EIS as inevitable impacts on our health and safety. We will not allow our way of life to be threatened by this plan.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.e. Risk of Terrorist Attack
- 10.b. Biological Resources Impacts
- 12.h. Tourism
- 2.a. Purpose and Need
- 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
- 3.a. Aircraft Operations
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.a. Regional Land Use and Community Character
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

Langley, WA 98260

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.

1.a. Thank You

7.b. Land Use Compatibility and Air Installations Compatible Use Zones

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 Dear Sir/Madam, Comments regarding the Draft Environmental Impact Statement (DEIS) were previously sent to your attention. Please consider these additional comments, which are more specific to the effects on the Marrowstone Island area, my home. 1. Sleep loss due to Growler noise. 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...” The EA-18G has a noise signature with elevated low frequencies. It is claimed that repeated exposure to high sound levels at these frequencies is detrimental to long term health according to the AMA and World Health Organization. Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, short-term memory loss, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep, and resulting antipathy toward the US Navy our tax dollars support. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. 2. Marrowstone Island is home to a significant population of waterfowl, either resident, or resting during migration. Increased Growler overflights will disturb this wildlife, and increase the hazard of bird strikes. A resident population of 200+ harbor seals uses Rat Island adjacent to Indian Island Naval Magazine. These protected marine mammals would likely be displaced by increased jet noise. 3. Noise estimates based on Navy modeling understate and have little relation to measured ground-level noise levels. 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. 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. Recreational hikers on nature walks at Deception Pass State Park report abandoning day hikes due to repeated fly-overs by Growlers. 4. Since DOD has deemed enhanced electronic warfare both real, is justified, this \$13 billion Growler deployment—a purely offensive weapon—should be subjected to a cost/benefit analysis which is lacking in the DEIS. Cost of sleep loss, lowered property values, reduced tourism and classroom disruption need to be modeled. We suggest that increasing flights over civilian population represents an avoidable wartime harm imposed unnecessarily on citizens who otherwise support our military. Seeking an alternative site that is not populated so heavily should be explored. Thank you for your consideration of these comments. Sincerely, [REDACTED] Nordland, WA 98358

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 10.m. Impacts to Marine Species and Habitat
- 12.o. Cost-Benefit Analysis
- 2.n. Alternatives Considered But Eliminated
- 4.j. Other Reports
- 4.l. Points of Interest
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.i. Deception Pass State Park and Other State Parks

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 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) 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] Nordland, WA 98358

Lopez Island, WA 98261

With all the open water in Puget Sound I have always wondered why the jets have to sit right on top of Lopez Island and slow down and blast their engines in maneuvers. To me this is a hostile, deliberate act that needs to be stopped. I agree with all the following 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 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

- 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

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.

Largely, Wa, WA 98260

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

The flights should be greatly reduced, not increased because 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). T

Largely, Wa, WA 98260

Your are poluting our environment. 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

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

5.a. Accident Potential Zones

5.c. Condition of Outlying Landing Field Coupeville

5.e. Lack of First Responders at Outlying Landing Field Coupeville

Largely, Wa, WA 98260

1.a. Thank You

13.a. Environmental Justice Impacts

You failed to accurately analyze the 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

Largely, Wa, WA 98260

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.

Largely, Wa, WA 98260

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

Largely, Wa, WA 98260

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.

Largely, Wa, WA 98260

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

Largely, Wa, WA 98260

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.

Largely, Wa, WA 98260

The noise is unbearable and 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

Largely, Wa, WA 98260

The noise is unhealthy and 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 and 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.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports

Largely, Wa, WA 98260

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

Your EIS was inaccurate since the DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebay'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.

Largely, Wa, WA 98260

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

Put this operation where it does not impact human health and quality of life. 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.

Largely, Wa, WA 98260

Your study was erroneous. 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

Largely, Wa, WA 98260

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

Re Navy is defying it's own rules. 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.

Largely, Wa, WA 98260

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

Re Navy is defying it's own rules. 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.

Largely, Wa, WA 98260

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.

Largely, Wa, WA 98260

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

Largely, Wa, WA 98260

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Adequate training of pilots could be accomplished without adverse community impacts through the use of flight simulators.

Largely, Wa, WA 98260

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.

Port Angeles, WA 98362

February 20, 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 for Naval Air Station (NAS) Whidbey Island I am writing to comment on this draft EIS which 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. Unfortunately, the Navy's draft EIS is critically deficient in several areas: 1. 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, taken a piecemeal approach to its aircraft training and testing activities affecting Whidbey Island, the Olympic Peninsula, and the San Juans Islands into multiple separate actions: - 4 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); - 2015 EIS discussing electronic warfare training and testing activity; - The current 2016-2017 DEIS (36 Growlers); - 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. 2. 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. 3. The Draft EIS Fails to Consider All Alternatives The Navy has not made a good faith effort to explore other alternatives as

- 1.a. Thank You
- 1.d. General Project Concerns
- 10.f. Endangered Species Impact Analysis Adequacy
- 12.h. Tourism
- 18.b. Average Carbon Dioxide per Aircraft
- 18.d. Washington State Greenhouse Gas Goals
- 19.b. Revised Cumulative Impacts Analysis
- 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.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.g. Average Annual Day/Average Busy Day Noise Levels
- 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
- 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

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.

4. 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 conserve energy. 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.

5. 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.

6. 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.

7. 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.¹ 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.

8. 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."² 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, the Navy must issue a revised, second draft EIS with a new public comment period. Thank you for considering my comments on this draft EIS. Sincerely, [REDACTED] Port Angeles, WA 98362

coupeville, WA 98239

February 21, 2017 To Whom It May Concern, We wish to explain our concerns about the Growlers flying over Coupeville WA, where we live and participate in outdoor activities. We have owned our home since 1995. We were aware, and even were required to sign, that planes would be flying over whidbey Island. We agreed to that...what we heard overhead was tolerable, though we would need to stop talking when outside and planes flew over, but we did not need to cover our ears. Now however since the Growlers began flights, we do need to cover our ears...there is a remarkable difference in sound. The Navy did compromise so that they fly only during the week, not weekends when large numbers of outdoor activities often occur. But the noise now can even rattle dishes in cupboards. We are concerned that even more Growlers will be assigned to Oak Harbor, which means ever more flights per day over our community and neighboring communities which include Anacortes and Camano on which we have friends and family who are also concerned particularly about the noise. 1. Noise...the noise modeling the navy uses is not relevant/representative to the noise made by the Growlers over a community. Their noise map ver 7.2 is outdated. The noise maximum now exceeds 90 dBA we understand. It is easy to believe. 2. Noise is unhealthy/detrimental to everyones hearing...particularly to developing children playing outside and to them while in classrooms, as the teacher needs to stop taking when the Growlers go overhead; the planes also distract focus. 3. We remember WWII and Hawaii....is it really smart/safe to have all the Growlers located in one place? There are other areas in eastern Washington, away from populations in which Growlers can be based. (We are not that far from North Korea and China). Even Growlers in OH can quickly reach western Washington areas for practice. There are many more issues i.e. water contamination, possibilities of earthquakes/distruction interfering with access to the base when in need, the effect on tourism which is a major economic income for Coupeville. But this needs to be short so it can be read quickly! Thank you for your time and consideration/compromise for our community. [REDACTED]

[REDACTED] Coupeville, WA 98239 [REDACTED]

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 12.n. Quality of Life
- 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.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

Freeland, WA 98249

The increase in Growler flights will have adverse affects on this community and the island in general. The noise levels are already hazardous to general health and a state of well-being. The noise is especially consequential for those at risk such as young children, youth, and elders as well as the local hospital. This will adversely affect the culture and economy by keeping people from using local businesses. The crisis of shortages in available and affordable housing is not being addressed by NAS and affects the entire island. Please take careful consideration of the impacts of this growth!! Regards, [REDACTED]

- 1.a. Thank You
- 12.f. Economic Hardship and Impacts
- 12.i. Housing Access and Affordability
- 12.n. Quality of Life
- 4.r. Nonauditory Health Effects

Freeland, WA 98249

I am very concerned about the method of obtaining decibel levels in the EIS statement. The effects on local citizens, animals and agricultural land (due to potential use of fire retardants) are vast. I believe the full environmental impact to the local education, economic, health, must be full considered. To increase the operations 7-fold is disastrous!!

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.m. Education Impacts
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model

Friday Harbor, WA 98250

I live a mile north of Friday Harbor. Sometimes the noise from the Whidbey Island NAS is deafening and disturbing. I feel that this is an unhealthy level of intrusion into the aural atmosphere of my home. Any increase in this effect would be unacceptable to me. I feel that there should be a decrease in noise levels, as it is already at an unacceptable level already.

- 1.a. Thank You
- 2.k. Range of Alternatives
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

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 [redacted]
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

Virginia is far away from here,
Please, we live out in a beautiful, rural
environment that has been mostly quiet. We
are having a very hard time w/ the growler noise. I
don't want my tax payer money to go to more growlers
or any new technology for quieting them. We
need funding to support food growing and healthcare and
many other systems that create peace.

01/08/16

www.QuietSkies.info

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.c. Socioeconomic Impacts
- 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

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:



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 [Redacted] Farm

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

Please switch to "C" weighting. "A" weighting does not measure low frequency accurately.

I run a farm, and we enjoy quiet, and so do our animals that make us a living. I am absolutely disgusted by the idea of 47% more noise flying over our fields. I don't care about your noise tests, this is not good for a peaceful existence! Please no more Growlers.

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.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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 [Redacted] Farm

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 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
- 12.n. Quality of Life
- 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.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see 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:

I'm concerned about wildlife, children
 & our Sandvay that has already
 been affected. It's noisy!
 Noisier than before!

(Continue on the back)

lopez island, WA 98261

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.

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism

February 12, 2017
Lopez Island, WA

RE: Comments on the draft EIS for EA-18G "Growler Airfield Operations at NASWI"

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

Dear EIS Project Manager,

I am a 20 year resident of Lopez Island, now retired, living on the east side of the Island approximately ten nautical miles due west of Ault Field on Whidbey Island, the home of NASWI.

This letter lists my comments and where appropriate limited recommendations regarding this draft EIS.

1. The EIS by design fails to address the chief source of noise pollution affecting northern Lopez Island.

By focusing on "Field Carrier Landing Practice," FCLP, the current draft EIS fails to measure and mitigate the noise impacts of aircraft flying the 10 NM approach pattern bisecting Lopez Island. These are aircraft returning to NASWI from out of the area according to the EIS. However, Navy pilots attending the Navy's Dec 7, 2016, Open House public meeting on Lopez indicated that the NASWI tower will divert aircraft to this 10 NM pattern whenever there are excess aircraft in the pattern.

The noise generated by EA-18G aircraft when they arrest their sink rates by powering up their twin jets is deafening- far greater on northern Lopez than any of the low frequency rumble coming from the FCLP patterns flown at OLF Coupeville. And the noise comes without warning so that for the first split second, our bodies suffer adrenaline spikes not knowing whether our tractor or vehicle has blown up and then, of course, the noise is at an intensity that precludes all thought and speech for the next ten seconds. The fact that the draft EIS has failed to include any measurement of this noise, and indeed has rejected the input of some 6000 noise complaints submitted from these Islands is a major failing. Assertions in the EIS that this traffic is the responsibility of the FAA which routes them, and so implying that their impact need not be addressed by the EIS, is insulting to those affected.

Doubling the din is the unfortunate practice, all too frequent, of pairs of EA-18G's flying in close formation on this route. That's four tongues of flame and noise pointing at you when they turn to the east. The noise abatement procedures frequently requested are ignored when these planes arrive at lower altitudes and need to apply power to maintain control.

Recommendation: The Navy place actual sound monitoring stations on the east side of Lopez Island, disallow close pairs flying on the 10 NM pattern, and include noise abatement procedures that set the altitude over affected areas to a minimum of 3000 ft.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 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.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.j. Flight Simulators
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation

2. The EIS has misstated both the timing and impact of the new automated flight control system that facilitates carrier landings.

Throughout the EIS the Navy asserts, “Landing on an aircraft carrier is one of the most dangerous tasks a pilot can perform, and is a perishable skill” (EIS p1-5). It has been also been cited as the activity that sets Navy Pilots apart from all others and is the reason behind requiring FLCP.

Hands-on pilot control of landing, however, is now becoming unnecessary. The new system of flight control, named by the long acronym “Magic Carpet” allows a pilot to select the point of contact on a carrier and the plane will fly to that point at the proper speed and glide slope. It does this with software controlling the aircraft with quick and minute changes to the wing flaps and tail “stabilator.” And, according to the trade press, it does this with great reliability after extensive testing. (See the Todd Miller, Aug.15, 2016, article in SLD referenced on the internet at <http://www.sldinfo.com/navair-magic-carpet-innovation-for-the-f-18-fleet/>).

The EIS on page 1-20, while noting the potential for Magic Carpet to “significantly reduce training requirements for FCLPS” also states that its full capabilities will be released in 2019 implying not much change will occur until 2019. In fact, as reported by EA-18G pilots in conversations at the Dec. 7, 2016, Open House public meeting on Lopez Island, an early version of Magic Carpet is now operational on all EA-18G’s at NASWI. Additional redundancy will be offered in the final version but with over 800 successful carrier landings as of last August, the current implementation is already present, operational, and apparently a game changer to Navy planners who insisted on its early implementation. It has proven to both lower stress on pilots and reduce wear and tear on the aircraft from high-g landings.

Recommendation: The Navy recognize the new reality and announce a revised training regimen for EA-18G “Growler” pilots and crew with greater emphasis on simulator and actual carrier landings with a concomitant reduction in FCLP activity, and the EIS be revised to analyze the impacts of that reduced FCLP activity level.

3. The EIS is written in a non-scientific and, on occasion, artful manner.

Other respondents have already addressed the use by EIS contractors of now obsolete noise simulation standards, the lack of actual verifying on-site noise measurements, and indeed, the out-of compliance size of the EIS document itself. All these violate the standards of analysis associated with scientific methods or required by NEPA. Here’s an example of an artful and inappropriate presentation:

On page 2-13 the EIS states in the final paragraph on operational synergy:

“Personnel efficiencies. Costs associated with “permanent change of station” moves account for a large portion of the Navy’s annual budget. Specifically, the Navy’s budget for such moves was \$937,745,000 in Fiscal Year 2016, out of a total budget of \$28,262,396,000 for all personnel costs (Navy, 2015a) ...”

When should 3.28% be considered a “large portion”? It’s actually quite small, though presented in a way, comparing millions digits to billions, that misleads the reader.

Recommendation: At a minimum, a rewrite of major portions of this draft EIS leading to a revised draft is appropriate, to both introduce more current methodology, and to improve the quality of data collected and generated. Editing for length by eliminating inappropriate and redundant topics would be helpful as well.

These are challenging times for the Navy and all efforts to enhance the scientific rigor of its decision – making should be rewarded by both greater effectiveness in the field and a greater community perception of the value of a strong United States Navy.

Thank you for your consideration of these comments and recommendations.

Sincerely,



Lopez Island, WA 98261

Lopez Island, WA 98261

February 12, 2017 Lopez Island, WA RE: Comments on the draft EIS for EA-18G "Growler Airfield Operations at NASWI EA-18G Growler EIS Project Manager Naval Facilities Engineering Command Atlantic 6506 Hampton Boulevard Norfolk, VA 23508 Attn: Code EV21/SS Dear EIS Project Manager, I am a 20 year resident of Lopez Island, now retired, living on the east side of the Island approximately ten nautical miles due west of Ault Field on Whidbey Island, the home of NASWI. This letter lists my comments and where appropriate limited recommendations regarding this draft EIS. 1. The EIS by design fails to address the chief source of noise pollution affecting northern Lopez Island. By focusing on "Field Carrier Landing Practice," FCLP, the current draft EIS fails to measure and mitigate the noise impacts of aircraft flying the 10 NM approach pattern bisecting Lopez Island. These are aircraft returning to NASWI from out of the area according to the EIS. However, Navy pilots attending the Navy's Dec 7, 2016, Open House public meeting on Lopez indicated that the NASWI tower will divert aircraft to this 10 NM pattern whenever there are excess aircraft in the pattern. The noise generated by EA-18G aircraft when they arrest their sink rates by powering up their twin jets is deafening- far greater on northern Lopez than any of the low frequency rumble coming from the FCLP patterns flown at OLF Coupeville. And the noise comes without warning so that for the first split second, our bodies suffer adrenaline spikes not knowing whether our tractor or vehicle has blown up and then, of course, the noise is at an intensity that precludes all thought and speech for the next ten seconds. The fact that the draft EIS has failed to include any measurement of this noise, and indeed has rejected the input of some 6000 noise complaints submitted from these Islands is a major failing. Assertions in the EIS that this traffic is the responsibility of the FAA which routes them, and so implying that their impact need not be addressed by the EIS, is insulting to those affected. Doubling the din is the unfortunate practice, all too frequent, of pairs of EA-18G's flying in close formation on this route. That's four tongues of flame and noise pointing at you when they turn to the east. The noise abatement procedures frequently requested are ignored when these planes arrive at lower altitudes and need to apply power to maintain control. Recommendation: The Navy place actual sound monitoring stations on the east side of Lopez Island, disallow close pairs flying on the 10 NM pattern, and include noise abatement procedures that set the altitude over affected areas to a minimum of 3000 ft. 2. The EIS has misstated both the timing and impact of the new automated flight control system that facilitates carrier landings. Throughout the EIS the Navy asserts, "Landing on an aircraft carrier is one of the most dangerous tasks a pilot can perform, and is a perishable skill" (EIS p1-5). It has been also been cited as the activity that sets Navy Pilots apart from all others and is the reason behind requiring FLCP. Hands-on pilot control of landing, however, is now becoming unnecessary. The new system of flight control, named by the long acronym "Magic Carpet" allows a pilot to select the point of contact on a carrier and the plane will fly to that point at the proper speed and glide slope. It does this with software controlling the aircraft with quick and minute changes to the wing flaps and tail "stabilator." And, according to the trade press, it does this with great reliability after extensive testing. (See the Todd Miller, Aug.15, 2016, article in SLD referenced on the internet at <http://www.sldinfo.com/navair-magic-carpet-innovation-for-the-f-18-fleet/>). The EIS on

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 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.n. Alternatives Considered But Eliminated
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- 4.n. Speech Interference (Indoor and Outdoor)
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[REDACTED] Lopez Island, WA 98261

Port Angeles, WA 98363

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).

1.a. Thank You

Oak Harbor, WA 98277

I am sorry for all the 'bleeding hearts' complaining about our aircraft. I am all for all the training needed to prepare our guys for their jobs upcoming. Hang in there and tell the people who don't like it to MOVE SOMEWHERE ELSE. As a member of the ERC in 1944 I didn't get the chance to fly as the war ended. Thanks to all our servicemen.

Sooke , British Columbia V9Z0E3

1.a. Thank You
18.d. Washington State Greenhouse Gas Goals
19.d. Electronic Warfare

Any increase in electronic warfare will affect communities on Southern Vancouver Island, like Sooke and Port Renfrew, creating additional massive sonar and explosive activity both in the air and ocean that touches both our shores, disrupting and causing unknown damage to cetaceans and potentially harming humans with the increase in air and noise pollution. Emissions will increase substantially and are a huge contributor to climate change. What YOU do severely impacts us in Sooke and should be a cause for alarm to all residents of the Olympic Peninsula and Pacific Northwest.

Coupeville, WA 98277

I've been a property owner in Coupeville since 1998 and am concerned that the DEIS fails to adequately take into account the economic impact on Coupeville, especially: 1. Coupeville's economy is highly dependent on tourism and small-farm agriculture - a potential increase to 33,600 operations from 6,100 will likely cripple Coupeville's tourism trade as well as residents' property values; and 2. The DEIS does not refer to the effect on Coupeville's biggest draw - Ebey's Landing National Historical Reserve. There is no reference to the National Park Service's 2015 noise study which measured two different points in Ebey's Reserve over a 30 day period. One representative 24-hour period cited in the study recorded 281 "military aircraft events" that exceeded 70 dBA - 10 dBA over the limit deemed to interrupt speech by visitors.

1.a. Thank You
12.h. Tourism
12.j. Property Values
4.j. Other Reports

Coupeville, WA 98277

I've been a property owner in Coupeville since 1998 and am painfully aware of how much louder Growlers are than the old Prowlers. With that in mind, the noise levels reported in the draft EIS are questionable for several reasons: 1. Actual noise measurements were not made, only modeled by computer; 2. The model used 365 days/year to arrive at the average daily decibel level instead of the actual non-weekend number of flying days flown per year - making the decibel level appear lower than it actually is; 3. Actual measurements by residents have recorded levels as high as 130 decibels during flyovers - far above the 80 dB that the DEIS indicates potentially cause hearing loss; and 4. The effects of flyover noise on Coupeville Elementary students are not adequately addressed and the effects on students at the Middle and High schools are not addressed at all.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.k. Comparison of the Prowler to the Growler
- 4.o. Classroom Learning Interference

Coupeville, WA 98277

I've been a property owner in Coupeville since 1998 and am painfully aware of how much louder Growlers are than the old Prowlers. With that in mind, my primary comments on the draft EIS are: 1. No alternatives to Whidbey Island were considered. The reasons given for not reviewing off-island alternatives - a 40-year history, travel distance, expense - are merely mentioned, not given a serious, hard look. The 1,500-page draft fails to show that there are not more suitable locations than Whidbey. There are no comments regarding the suitability of locations such as NAS Fallon, Nevada. 2. The DEIS also does not address a potential national security threat. It says nothing about why our country should have all its electronic attack equipment in one location. Especially on an island that is: 1) susceptible to terrorist attack because it is only accessible by bridge or ferry; and 2) in an area of the country susceptible to earthquake and tsunami.

1.a. Thank You

1.e. Risk of Terrorist Attack

16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)

2.a. Purpose and Need

2.k. Range of Alternatives

2.n. Alternatives Considered But Eliminated

Coupeville, WA 98277

I've been a property owner in Coupeville since 1998 and I am concerned about potential accidents at the OLF and resulting water contamination. 1. The DEIS does not adequately address the potential for increased accidents in the potential six-fold increase in flights at the OLF. Pilots are trainees learning new, dangerous maneuvers, increasing accident risk above routine flights done by seasoned pilots. Accidents result in the use of fire-fighting foams with chemicals that have contaminated private and public drinking water wells near OLF. 2. The EPA's Health Advisory Levels for two of these chemicals - PFOA and PFOS - is 70 parts per trillion (PPT). The Navy is currently testing wells for three chemicals, PFOA, PFOS and PFBS - all of which the EPA lists as likely human carcinogens. So far, 10% of wells tested are above EPA limits - one as high as 440 PPT. These banned toxins are still being stored on Whidbey for emergency use and increased flight operations will increase the risk of accidents, fires and the need to use the foams.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

5.a. Accident Potential Zones

5.d. Environmental Health Risks and Safety Risks to Children

1.a. Thank You

Coupeville, WA 98239

My home on Penn Cove is instantly transformed from a peaceful enclave to a war zone when the Growler's start doing touch-and-goes. Please don't add more to an untenable situation.

1.a. Thank You

Chimacum, WA 98325-7800

Although as a former military officer I respect the need for a strong military defense, the Pacific Northwest is just not the proper place to carry out such training missions.

1.a. Thank You

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
depos@likkellcourtreporters.com

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

(425) 259-3330

13 (The personal identifiable information disclosure
14 statement was read to the following commenter.)

15 [REDACTED] I acknowledge that you read --
16 I acknowledge that you read that to me. My name is [REDACTED]

17 [REDACTED]
18 So our Navy deserves the best possible training.

19 And so Ault Field and OLF are an extremely important part of
20 the training that they receive. And the hotels on the
21 island, 90 to 95 percent of their business comes from the
22 Navy, so we are a hundred percent for them getting the best
23 possible training.

24 * * *

Greenbank, WA 98253

I appreciate the opportunity to provide comment. I am concerned that only modeling versus actual noise measurements have been used. Please perform actual noise measurements as it will be models but actual community members that will be sharing the island with the jets. Also, I did not see crash frequency or impacts addressed, please do so. Please consider noise reduction options more thoroughly as well as economic impact on property value loss, tourism, and impacts on businesses. Also fuel dump effects and frequency was not addressed. I believe contamination effects on wells is not adequately addressed as well as impacts on all natural resources both animal and plant including impact on the Historic Reserve.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 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



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 *USAF / USARMY RETIRED*

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 THE FLIGHT PATTERN OF SEA TAC. I HAVE AIRCRAFT OVER HEAD DAY AND NIGHT ALSO BOEING FLIGHT TESTING AIRCRAFT DOES NOT BOTHER ME. MY GIRL FRIEND AND I HAVE AN ANNUAL TRADITION TO SCRAM AND FLY AT HURRICANE RIDGE. WE HAVE NEVER BEEN BOTHERED BY GROWLER NOISE

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 GREW UP AFTER 2ND WORLD
WAR. CLOSING THE BASES AFTER
THE WAR AFFECTED THE LOCAL
ECONOMY IN A NEGATIVE WAY

I WAS POVERTY VILLE HERE
IN JEFF CO. FOR DECADES

I LEARNED TO RESEARCH
MY AREA OF RESIDENCE FOR
POSITIVE AND NEGATIVE. I HAVE
NO SYMPATHY FOR THOSE WHO
DONT, WITH THE POSSIBLE EXCEPTION
OF LIVING IN THE AREA THAT IS
THE SOURCE OF YOUR LIVER HOOD,

Thank

For more information, please visit the project website at whidbeyeis.com

Please print

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YOUR INPUT MATTERS

1002860 0041 10
Whidbey 2016_Comment Sheet.at-GRA-6/23/16

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

3. Address _____ *Langley WA 98260*

4. Email _____

- 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.i. 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

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)

- 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:

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For more information, see, Coupeville Community Allies, 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

Brentwood Bay , British Columbia V8M2H5

I am really fed up of the increased rumblings going on over Vancouver Island. I would prefer that the US Navy stayed over their own country rather than disturbing the peace in Canada.

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

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1. Name _____

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3. Address _____ *Coupeville WA 98239*

4. Email _____

5. Phone _____

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- 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

Comments

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- 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)

- 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.
- 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
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
 - b. U.S. Senator Maria Cantwell: 425.303.0114; www.cantwell.senate.gov
 - c. U.S. Congressman Rick Larson: 800.652.1385; rick.larsen@mail.house.gov
 - d. Governor Jay Inslee: 360.902.4111; governor.wa.gov

To Learn More

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vermilion, OH 44089

The Navy's DEIS ignores the harmful consequences of Growler operations taking place in the Olympics & Whidbey Island. It does not address the true environmental & public health impact of planned growler increases. The noise & pollution has a very negative effect on wildlife. There will be increased fuel. It is also a violation of the National Environmental Policy Act. The Growler training should be relocated from Whidbey Island & the Olympics to a less populated area but not where wildlife will suffer from the noise. More studies need to be done about the effects of the increased noise Pollution. let's keep Whidbey & the Olympics the beautiful & pristine places that they are. When they have been ruined by man, they are gone forever. There is not a second chance. Thank you.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 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

vermilion, OH 44089

The DEIS on the proposed addition of 36 Growler aircraft at NAS Whidbey Island is in progress. There are already 82 with 12 back-up. Now there is funding & scheduling for these Growler jets to be at Whidbey in 2017. This would create more noise & is offensive to the people, the wildlife enthusiasts, the wildlife, & the environment. The military is already invading the pristine Olympic National Forest disturbing the ecosystem. Our national parks should be enjoyed & remain wild, NOT military operations. When the wilderness is gone, it is gone forever. Please do NOT expand Growler jets over the ONP or Whidbey Island. I cannot attend meetings. I am a former resident of WA state that wishes to keep the pristine wilderness intact in the beautiful state of WA. Take your noisy disturbing military operations elsewhere. Thank you

1.a. Thank You

12.n. Quality of Life

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

vermilion, OH 44089

The Navy's DEIS ignores the harmful consequences of increased Growler operations taking place on Whidbey Island. It does not address the true environmental & public health impact if more growlers are added. It is in violation of the National Environmental Policy Act. Growler training should be relocated from Whidbey Island to a less populated area but not where wildlife will suffer from the noise. More studies need to be made about the horrible noise pollution. Let's keep the island a great place to live in America. Thank you.

- 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.r. Nonauditory Health Effects

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

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- 7.a. Regional Land Use and Community Character

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(over)

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 - c. U.S. Congressman Rick Larson: 800.652.1385; rick.larsen@mail.house.gov
 - d. Governor Jay Inslee: 360.902.4111; governor.wa.gov

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Seattle, WA 98122

The Olympic Peninsula is no place for war games!!! The wildlife will suffer as well as the planet as a whole. 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

18.b. Average Carbon Dioxide per Aircraft

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

19.d. Electronic Warfare

1.a. Thank You
12.n. Quality of Life

Freeland, WA 98249

Please preserve our way of island life

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 _____

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 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
- 12.n. Quality of Life
- 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.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see 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:

Please take seriously your impact on our community - We have lived with your noise for years but now it is unbearable

(Continue on the back)

Clinton, WA 98236

I have been engaged in monitoring and opposing the increase in Growler deployment at NASWI for the past three years. I have become reasonably well informed regarding the issues, including paying close attention to the stated needs of the Navy. I am opposed to the extension of the Growler fleet as proposed under the current DEIS on the basis of the information I have learned and the concerns I have as a result. Most of these concerns have been widely expressed by others, and by me previously in public forums, so I will only summarize. 1) The noise from the Growlers is damaging to our environment, our people, our economy, our way of life. Measurements of well over 100 dbL have been widely recorded, especially around the OLF but elsewhere. This level of sound is clearly beyond the levels considered safe, and therefore we conclude they are violent and dangerous - and I have learned this is true even more so at Ault Field relative to the OLF, and I conclude that the sound is injurious to everyone exposed and should be mitigated and avoided. What is most disturbing is that the Navy is willing to accept "collateral damage" on the people of our island, including those at Ault Field. They use an averaging formula to justify the violence of the Growler noise and call it so arrogantly an "annoyance." For those subjected to the noise, especially at night, the noise is far more than an annoyance and is actually a health hazard and an affront to livability here on Whidbey. I understand the Navy believes the OLF is crucial for their operations, but experience has shown otherwise. There have been long periods of time when they have not used the OLF, and, although there is disagreement, it seems not only possible but preferable that the Growler training take place in other than even relatively sparsely populated areas given that the training is so toxic and the Growlers are injuring the very people they claim to protect. My final comment is that the Navy knows these planes emit significantly dangerous noise. They anticipated this when they were built. Yet they keep building them at some \$80+million dollars, and are now proposing to send even more to be based at NASWI, and thus continuing to further injure people by flying them in populated areas like Whidbey Island and undoubtedly injuring their own service crews. 2) The buildup of personnel and the related impact on the social services and schools, housing, transportation needs will irreparably change and damage the social fabric of Whidbey Island. 3) Finally, I am deeply concerned about the impact of the increase of the Growlers on the agricultural nature of Whidbey Island. The planes fly most often in the summer when the farmers need to tend their crops. But they are not able to do so due to the exposure of the toxic noise. I deeply regret the damage this will do not only for those depending on farming for their livelihood, but for all of us who support them and are proud of our local food production. In conclusion I am strongly opposed to the buildup of the Growler fleet on Whidbey island. I will do all I can to oppose and resist it. I have little or no trust that the EIS will become a significant factor in the Navy's decision because I have found them largely unaccountable to anyone other than themselves. My impression is that the decision to build up the fleet has already been determined by a combination of the Pentagon and the Boeing industry and elsewhere that will benefit from the Growler sales. The political climate of our nation is in turmoil. I can only hope that those in the Pentagon on down, and the military contractors, will somehow put the needs of the American people above their privilege and self-serving interests and become true protectors of the American people and our Constitutional democracy. A decision not to

- 1.a. Thank You
- 1.d. General Project Concerns
- 12.e. Agriculture Analysis
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- 12.m. Education Impacts
- 12.n. Quality of Life
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- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

build up the NASWI would be a welcome sign of that kind of patriotism Thank you for the opportunity to express my opinions. [REDACTED]

I have been engaged in monitoring and opposing the increase in Growler deployment at NASWI for the past three years. I have become reasonably well informed regarding the issues, including paying close attention to the stated needs of the Navy. I am opposed to the extension of the Growler fleet as proposed under the current DEIS on the basis of the information I have learned and the concerns I have as a result. Most of these concerns have been widely expressed by others, and by me previously in public forums, so I will only summarize. 1) The noise from the Growlers is damaging to our environment, our people, our economy, our way of life. Measurements of well over 100 dBl have been widely recorded, especially around the OLF but elsewhere. This level of sound is clearly beyond the levels considered safe, and therefore we conclude they are violent and dangerous - and I have learned this is true even more so at Ault Field relative to the OLF, and I conclude that the sound is injurious to everyone exposed and should be mitigated and avoided. What is most disturbing is that the Navy is willing to accept "collateral damage" on the people of our island, including those at Ault Field. They use an averaging formula to justify the violence of the Growler noise and call it so arrogantly an "annoyance." For those subjected to the noise, especially at night, the noise is far more than an annoyance and is actually a health hazard and an affront to livability here on Whidbey. I understand the Navy believes the OLF is crucial for their operations, but experience has shown otherwise. There have been long periods of time when they have not used the OLF, and, although there is disagreement, it seems not only possible but preferable that the Growler training take place in other than even relatively sparsely populated areas given that the training is so toxic and the Growlers are injuring the very people they claim to protect. My final comment is that the Navy knows these planes emit significantly dangerous noise. They anticipated this when they were built. Yet they keep building them at some \$80+million dollars, and are now proposing to send even more to be based at NASWI, and thus continuing to further injure people by flying them in populated areas like Whidbey Island and undoubtedly injuring their own service crews. 2) The buildup of personnel and the related impact on the social services and schools, housing, transportation needs will irreparably change and damage the social fabric of Whidbey Island. 3) Finally, I am deeply concerned about the impact of the increase of the Growlers on the agricultural nature of Whidbey Island. The planes fly most often in the summer when the farmers need to tend their crops. But they are not able to do so due to the exposure of the toxic noise. I deeply regret the damage this will do not only for those depending on farming for their livelihood, but for all of us who support them and are proud of our local food production. In conclusion I am strongly opposed to the buildup of the Growler fleet on Whidbey island. I will do all I can to oppose and resist it. I have little or no trust that the EIS will become a significant factor in the Navy's decision because I have found them largely unaccountable to anyone other than themselves. My impression is that the decision to build up the fleet has already been determined by a combination of the Pentagon and the Boeing industry and elsewhere that will benefit from the Growler sales. The political climate of our nation is in turmoil. I can only hope that those in the Pentagon on down, and the military contractors, will somehow put the needs of the American people above their privilege and self-serving interests and become true protectors of the American people and our Constitutional democracy. A decision not to

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Commander
 US Fleet Forces Command
 1562 Mitscher Ave. Suite 250
 Norfolk, VA 23551-2487

Feb. 18, 2017

Comments regarding the DEIS, NAISWI

I have been engaged in monitoring and opposing the increase in Growler deployment at NASWI for the past three years. I have become reasonably well informed regarding the issues, including paying close attention to the stated needs of the Navy. I am opposed to the extension of the Growler fleet as proposed under the current DEIS on the basis of the information I have learned and the concerns noted below:

1) The noise from the Growlers is damaging to our environment, our people, our economy, our way of life. Measurements of well over 100 db have been widely recorded, especially around the OLF but elsewhere. This level of sound is clearly beyond the levels considered safe, and therefore we conclude they are violent and dangerous - and I have learned this is true even more so at Ault Field relative to the OLF, and I conclude that the sound is injurious to everyone exposed and should be mitigated and avoided.

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I understand the Navy believes the OLF is crucial for their operations, but experience has shown otherwise. There have been long periods of time when they have not used the OLF, and, although there is disagreement, it seems not only possible but preferable that the Growler training take place in other than even relatively sparsely populated areas given that the training is so toxic and the Growlers are injuring the very people they claim to protect.

My final comment is that the Navy knows these planes emit significantly dangerous noise. They anticipated this when they were built. Yet they keep building them at some \$80+million dollars, and are now proposing to send even more to be based at NASWI, and thus continuing to further injure people by flying them in populated areas like Whidbey Island and undoubtedly injuring their own service crews.

2) The buildup of personnel and the related impact on the social services and schools, housing, transportation needs will irreparably change and damage the social fabric of Whidbey Island.

3) Finally, I am deeply concerned about the impact of the increase of the Growlers on the agricultural nature of Whidbey Island. The planes fly most often in the summer when the farmers need to tend their crops. But they are not able to do so due to the exposure of the toxic noise. I deeply regret the damage this will do not only for those depending on farming for their livelihood, but for all of us who support them and are proud of our local food production.

In conclusion I am strongly opposed to the buildup of the Growler fleet on Whidbey island. I will do all

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- 1.d. General Project Concerns
- 12.e. Agriculture Analysis
- 12.i. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 14.a. Transportation Impacts
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

I can't oppose and resist it. I have little or no trust that the EIS will become a significant factor in the Navy's decision because I have found them largely unaccountable to anyone other than themselves. My impression is that the decision to build up the fleet has already been determined by a combination of the Pentagon and the Boeing industry and elsewhere that will benefit from the Growler sales.

The political climate of our nation is in turmoil. I can only hope that those in the Pentagon on down, and the military contractors, will somehow put the needs of the American people above their privilege and self-serving interests and become true protectors of the American people and our Constitutional democracy. A decision not to build up the NASWI would be a welcome sign of that kind of patriotism.

Thank you for the opportunity to express my opinions.

██████████



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 _____

3. Address [REDACTED] Port Townsend, WA 9836

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 protest the escalation of growler presence and escalation of EMF testing and other forms of warfare weapons. I speak on behalf of the environmental impact upon humans and animals including the sound pollution of the Olympic National Park and the Salish Sea, as well as the waters surrounding the evening of Dec 5, 2011, I reported a Noise Complaint,

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
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 12.j. Property Values
- 12.n. Quality of Life
- 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.d. Recreation and Wilderness Analysis and Study Area

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 concern to the Whidbey Island Naval Air Station Base by calling the Commander at (360) 257-2681

I spoke with a person, who assured me I would get a call back but I did not.

The noise was significant enough, that I thought it was an earthquake and upon exiting my home, I stood in the back yard (in the Uptown Courthouse Neighborhood)

and it appeared as though a school bus was attempting to land on my roof. The headlights of the plane illuminated my rooftop. The red & green lights looked like stage lighting (bright & close). Through the Straits of Juan de Fuca, noise travels. It is a terrible sound. My property values will go down as will my neighbor's.

I am upset to see state proper law enforcement at this event. Who pays for their presence? The taxpayer?

For more information, please visit the project website at whidbeyeis.com

This is insanity. Go train somewhere far away.

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 significant

1002860.0041.10

January 2016_Comment Sheet at-GRA-6/23/16

Not over land nor in environmentally fragile ecosystems!

Coupeville, WA 98239

Increase in Outlying Field (OLF) operations will significantly harm our property values and quality of life as well as severely impact our primary industry which is farming and tourism.

- 1.a. Thank You
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

when my wife and I purchased our home on Whidbey island we were aware of the existence of the OLF. We were shown a map purporting to show the different noise level areas. We made certain to purchase a home where the noise levels were shown as low. Much to our surprise we found aircraft flying directly over our home. They also fly directly over the hospital in Coupeville and several local schools. At the current number of flights the disruption is tolerable but certainly not pleasant. In the summer we cannot sleep with our bedroom windows open due to aircraft noise. The proposed increase in flights to over thirty thousand is ridiculous. That works out to be over 90 a day. The impact on the standard of living on this part of Whidbey Island would be immense. Property values would plummet. Of course the Navy would be more than happy to reimburse those of us who had a significant portion of our retirement investment wiped out. Talk to any Realtor in the area and I am certain that you will find tales of sales lost because of aircraft noise. When OLF first began operating the planes were much quieter and the population of the island was lower. Why should a small portion of the population bear the brunt of lowered quality of life and lost investment values? As a significant portion of those in favor of the expansion of the Growler program are either active duty Navy or retired Navy and dependents in Oak Harbor it seems reasonable that they enjoy the jet noise they love so much. Have all additional flights routed over Oak Harbor. I am not anti-military and have nothing against the Navy. I am a Vietnam Air Force Veteran and know that we need a trained military. I do not believe, however that this proposed action is reasonable.

- 1.a. Thank You
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 2.m. Record of Decision/Preferred Alternative
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.p. Sleep Disturbance

1.a. Thank You

, WA 98221

I fully support NAS Whidbey Island Growler operations. I believe that the vocal minority who have raised "concerns" with jet noise are largely ignorant, selfish, political sycophants whose interests and agendas generally run counter to the greater Whidbey island community. Jet aircraft have been operating at NAS Whidbey Island for over 50 years, I agree that periodic environmental impact studies should be done - however, I believe this particular study has been co-opted by a relatively few people who, for the above reasons, have chosen to use this study for purposed other than what was intended. The irony is, that the brave men and women who fly those jets do so in service to the very people whose complaints here threaten their ability to do so.

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

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.

1. Name [REDACTED]

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

3. Address [REDACTED] *Langley, WA 98260*

4. Email [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.

Comments

For additional information see Coupeville Community Allies at www.facebook.com/whidbeyeis

1. **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.**
2. **Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with PFOA compounds from Navy firefighting foam, which the Navy continues to use for aircraft fires. The extent has not been determined nor have results been shared with the community. There is no mitigation plan in place.

(over)

- 1.a. Thank You
- 11.a. Groundwater
- 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.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.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

3. The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.
4. 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.
5. 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.
6. 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.
7. 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.

Additional Comments: It is not fair for one community to
bear the brunt of all this air traffic and the
pollution there within. Pollution to the ground
water and wells is especially dangerous for residents
of an island. Members of the Navy and civilians both
share Whidbey island and both should be concerned to the
utmost for the care and protection of its water.

Please mail your comment to:
Naval Facilities Engineering Command Atlantic
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

Comments must be postmarked by January 25, 2017

Langley, WA 98260

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

It is not fair for one community to bear the brunt of all this air traffic and the connected pollution; specifically to ground water and wells. Members and employees of the US Navy and civilians both share Whidbey Island and both should be vigilant in protecting its finite water supply

Jan. 12, 2017

Coupeville, WA 98239

EA-186 EIS PROJECT MANAGER
NAVAL FACILITIES ENGINEERING COMMAND ATLANTIC
ATTN: CORE EV ZISS
6506 HAMPTON BLVD.
NORFOLK, VA. 23508

Dear Sir:

This Letter is in Response to recent information received from
Town of Coupeville Mayor Molly Hughes. (Enclosed).

We live in the OLF Coupeville touch & go Flight Pattern
Landing Field.

We have lived here for 35 years & owned the property since.

We also understand all the problems you are facing & offer some
suggestions. I am also a Navy Veteran served in World War II.
I also have good memories of the Navy.

I suggest in your review of the anticipated Increase in
Landings at OLF Field Coupeville. You would be creating a
High Problem in the Coupeville Community -

Health Problems such as: Noise levels, sleep problems do to
Flying to 11:00 - 12:00 with flying. This very much affects my
Life. The previous flights were bad enough anticipated increase
would be unbearable.

Also a another factor to consider is the De-Valuation of our
Home & Property.

Possible suggestions:

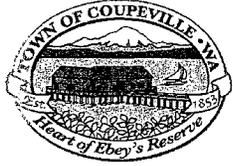
- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.l. Bird Migration
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
 - 4.a. General Noise Modeling
 - 4.d. Day-Night Average Sound Level Metric
 - 4.f. Noise Measurements/Modeling/On-Site Validation
 - 4.n. Speech Interference (Indoor and Outdoor)
 - 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
- 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.b. Land Use Compatibility and Air Installations Compatible Use
Zones
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

[REDACTED]
Coupeville, WA 98239 [REDACTED]

1. muffle the Jet airplane noise on each airplane.
(which I understand can be done)
2. Look to other areas for Touch & go Landings.
A. I understand there is a vacant airstrip (airfield)
outside of Spokane, wa. that would be glad to
except your Touch & go Landing operations.
3. the Desert area in Eastern wa. property that is by the
Government.
4. Planes could use these other options for Touch & go
but be Home based on Whidbey Island. This could be the
of both Worlds.

I Thank you in advance to your kind Consideration
in these matters!

Thank you
[REDACTED]



Dear Resident,

The Navy's draft Environmental Impact Study (EIS), outlining the potential impacts of bringing more EA-18G Growler aircraft to NAS Whidbey Island has been released. You can read the entire study at www.whidbeyeis.com.

Most Growlers are deployed on aircraft carriers. Pilots need field carrier landing practice (FCLP), commonly called 'touch and goes'. The Navy prefers to do this type of training at OLF Coupeville, as the airstrip closely resembles the landing area of an aircraft carrier. The Navy has outlined different alternatives for achieving the necessary number of FCLP's required to train pilots.

- All alternatives include bringing at least 35 new Growlers to NAS Whidbey Island
- No alternatives allow for the same or fewer FCLP's as are currently allowed at OLF
- The largest variable between alternatives is the number of FCLP's at Ault Field vs. OLF
- The total FCLP's currently allowed at OLF is 6,120 per year

Proposed FCLP's at OLF Coupeville

Scenario A: 20% Ault/80% OLF – 33,500 to 35,100 total FCLP per year at OLF

Scenario B: 50% Ault/50% OLF – 21,000 to 21,900 total FCLP per year at OLF

Scenario C: 80% Ault/20% OLF – 8,300 to 8,800 total FCLP per year at OLF

These alternatives mean a minimum of a 36% increase of FCLP's at OLF Coupeville, and a maximum of a 475% increase. Scenario B would mean a 250% increase in FCLP's.

If you would like to comment on the EIS, you must do so before the January 25, 2017 deadline. There are three ways to provide feedback to the Navy on the EIS.

1. The Navy will be holding public meetings to answer questions and take comment. The Coupeville meeting will be Friday, December 9 from 4-7 pm in the High School Commons.
2. You may email comments to www.whidbeyeis.com/Comment.aspx
3. You may mail comments to: EA-18G EIS Project Manager
NavaF Facilities Engineering Command Atlantic
Attn: Code EV21/SS
6506 Hampton Blvd
Norfolk, VA 23508

The information in this letter only addresses the increased number of FCLP's at OLF Coupeville. The draft EIS contains much more information; noise study, environmental impacts, impacts on historic resources, larger noise zones, change in flight patterns, new Accident Potential Zones (APZ), and possible mitigations. I encourage you to read the document online and if you would like to comment, remember the deadline of January 25, it will be easy to miss during the busy holiday season.

Sincerely,

Molly Hughes

Molly Hughes
Mayor

Growler Expansion at OLF Coupeville

What you can do:

1. **Comment on the Navy's Environmental Impact Statement at <http://whidbeyeis.com/Comment.aspx>** Comments due by January 25.
Key points to comment on:
 - **Water contamination** to our wells is not addressed.
 - **Actual noise measurements were not made.** Noise modeling is outdated & noise averaging inappropriate. Measurements made by the National Park Service show noise levels far in excess of that predicted by the modeling.
 - **Jet noise reduction options** are not thoroughly considered.
 - **Crash** frequency and impacts are not addressed.
 - 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**.
 - **Economic impact** on tourism, **property value loss**, decline of population, loss of businesses are not addressed adequately.
 - Impact to **natural resources** is not addressed: bird migration and animal habitat; impact on Ebey's Landing National Historic Reserve.
 - Frequency and effects of **fuel dumping** not addressed.

2. Call (best) or email your elected officials and share your concerns. Ask them extend the EIS comment deadline. The number of calls are important and you may call daily.
 - Governor Jay Inslee: 360.902.4111; governor.wa.gov
 - U.S. Senator Patty Murray: 206.553.5545; www.murray.senate.gov
 - U.S. Senator Maria Cantwell: 425.303.0114; www.cantwell.senate.gov
 - U.S. Congressman Rick Larson: 800.652.1385; rick.larsen@mail.house.gov
 - Island County Commissioner, District 1, Helen Price-Johnson: 360.679.7354; district1@co.island.wa.us

3. Sign the online petition to our elected officials. This is easiest to access from the CCA Facebook page. Or type <http://bit.ly/2gZwR5Q> into your browser.

To Learn More

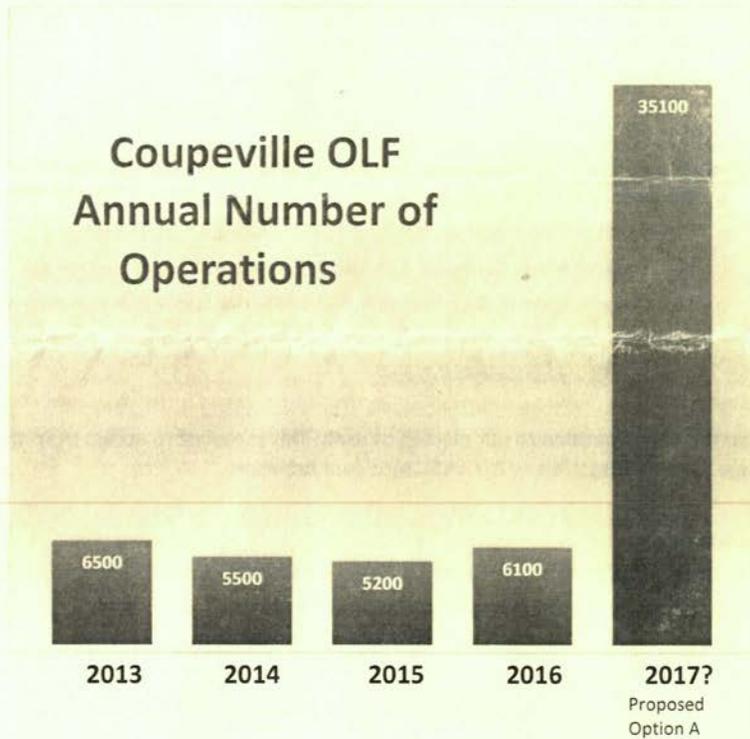
- ✓ To receive email updates, or to get involved, email us at coupevillecommunityallies@gmail.com
- ✓ Follow us on Facebook at Coupeville Community Allies
- ✓ Review the Draft EIS and appendices at www.whidbeyeis.com

Growler Expansion at OLF Coupeville

Prepared by Coupeville Community Allies

What you should know about impacts to our community by the Navy proposal:

- The Navy preferred plan increases flight operations from a current average of 6,100 to 35,100 per year. This is an average of 135 operations per day, every day, except weekends.
- Coupeville classrooms will be interrupted up to 5 times per hour, or every 12 minutes.
- Noise impact to local parks will nearly double.
- At least 3865 people will be significantly impacted by noise.
- Commercial areas subject to noise impacts will increase by ten-fold. More agricultural and residential areas will be impacted.
- Property values and property rights will be impacted by establishment of Accident Potential Zones (APZ).
- In two of Coupeville's four wells, Navy tests found significant levels of toxic contamination linked to Navy fire retardant use. Ongoing testing of private wells around the OLF indicates that ground water contamination may be widespread.



1.a. Thank You

Oak Harbor, WA 98277

1st generation and lived in Oak Harbor all of my life. Now at 55 years old it amazes me that any of this is an issue! The base and OLF has been a huge asset to Whidbey Island and the Navy! Keep the training at OLF because it is vital for pilots training and that strip has been there longer than any of the few that are complaining . The military is the reason folks get to complain, without the military there would be no freedom, would be some other countries planes flying if wasn't for the military, Keep NAS Whidbey as your premier base for aircraft landing and radar jamming planes!!

1.a. Thank You

Oak Harbor, WA 98277

1st generation and lived in Oak Harbor all of my life. Now at 55 years old it amazes me that any of this is an issue! The base and OLF has been a huge asset to Whidbey Island and the Navy! Keep the training at OLF because it is vital for pilots training and that strip has been there longer than any of the few that are complaining . The military is the reason folks get to complain, without the military there would be no freedom, would be some other countries planes flying if wasn't for the military, Keep NAS Whidbey as your premier base for aircraft landing and radar jamming planes!!

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 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

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.

Seattle , WA 98105

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

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.

Decatur Island, WA 98221

Over the years we've lived on the south end of Decatur Island where jet noise has become increasingly intolerable. The frequency of 'growler' overflight has increased with intolerable sound levels. Conversation can become impossible and sleep is now often interrupted. Previously levels of overflight noise was limited in hours. We could depend on a night's sleep without being awakened very late with pressing loud noise shaking us from our beds. We could balance the country's need for defense against our occasional interruptions. However the increased noise and frequency are terrible. Many of us are elderly, having retired to the Islands after long working careers. We believe that frequent exposure to ear-splitting 'growler' noise is an assault on those of us who have worked hard and wish only to retire with a modicum of dignity and peace.

- 1.a. Thank You
- 4.l. Points of Interest
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance

1.a. Thank You
12.h. Tourism

December 9, 2016

Regarding the WhidbeyEIS:

I own and operate a bed & breakfast business on Whidbey Island, located about 9 highway miles north of Outlying Field.

At current levels, the jet noise at my location doesn't bother me much personally. My b&b guests, however, react negatively when exposed to jet noise while they're here.

The EIS acknowledges the negative impacts of jet noise "with respect to recreation" in Section 6.3. What the EIS doesn't acknowledge is that tourists notice and dislike jet noise far beyond the immediate neighborhoods surrounding the airfields.

The majority of our tourists come to experience the natural beauty of Whidbey Island. Kayaking, whale watching, hiking in our state parks, and attending outdoor weddings are primary draws. I am concerned that a significant increase in jet noise will do substantial damage to the tourist economy of Whidbey Island.

Sincerely,

██████████, Owner

████████████████████

Coupeville, WA 98239

- 1.a. Thank You
- 1.d. General Project Concerns

I am concerned about increased jet activity and would like to stay involved in what happens in our community relative to the frequency of flyovers at OLF.

Anacortes, WA 98221

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

The training aircrew receive at OLF Coupvilpe is critical to their ability to safely operate in the very unforgiving environment of landing jets on aircraft carriers at night. Disclosures to residences around the OLF identify the noise issues--those who choose to live there do so willingly and fully informed, to claim otherwise is disingenuous. An 80% OLF/20% Ault Filed will provide these brave Americans the proper training they need. It is our moral responsibility to our sons and daughters in harms way doing the tough job and I fully support the EIS.



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

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 have lived here for over 40 years. The OLF is certainly the best choice for training & qualifying our brave young men & women Naval Aviators.
My recommendation is for 80% of FCLPS at OLF Camp Pendleton and 20% NAS.

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

Anacortes, WA 98221

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

The training aircrew receive at OLF Coupeville is critical to their ability to safely operate in the very unforgiving environment of landing jets on aircraft carriers at night. Disclosures to residences around the OLF identify the noise issues--those who choose to live there do so willingly and fully informed, to claim otherwise is disingenuous. An 80% OLF/20% Ault Filed will provide these brave Americans the proper training they need. It is our moral responsibility to our sons and daughters in harms way doing the tough job and I fully support the EIS.

Sequim, WA 98382

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

I support all three action alternatives. The Secretary of the Navy should select one or more alternatives based on DOD mission requirements. The public is not capable of making an informed decision as to force structure. Within the selected alternative(s), I support Scenario A because it provides superior training. Lives at risk are more important than dollars or decibels.

Anacortes, WA 98221

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

The training aircrew receive at OLF Coupvilpe is critical to their ability to safely operate in the very unforgiving environment of landing jets on aircraft carriers at night. Disclosures to residences around the OLF identify the noise issues--those who choose to live there do so willingly and fully informed, to claim otherwise is disingenuous. An 80% OLF/20% Ault Filed will provide these brace Americans the proper training they need. It is our moral responsibility to our sons and daughters in harms way doing the tough job and I fully support the EIS.

oak harbor, WA 98277

I am writing to voice my STRONG objection to the extraordinary proposed expansion of the so-called "Growler" airfield operations at Whidbey Island. While my concerns are multiple--including but not limited to the health impact on the human population (and possibly compromised learning development of children); the surely negative impact on marine and terrestrial life; the danger of aquafer contamination; the compromise of our relationships and responsibilities within this delicate ecosystem; the disadvantages and moral objectionableness of a basically militarized local economy; and the plain and simple horror of having to personally process as many as 135 operations a day!--I am perhaps most appalled that more consideration has not been given to the operational risks of concentrating virtually ALL electronic warfare aircraft in one highly vulnerable location. This is an island. What happens if someone takes a whack at us? There is ONE 24 hour entrance/egress--the historic and highly fragile Deception Pass Bridge (which also carries water for all of Oak Harbor and the NAS). Apart from the bridge there are two ferry lines--also highly vulnerable to attack. Moreover, it simply makes no sense not to site a Growler operation on the east coast, in proximity to the greater concentration of Army, USMC, special forces and tactical airforce units. In all, it is unacceptable to impose such an enormous negative burden on a small rural community without THOROUGH and waaaaayyy more thoughtful consideration of impact and alternatives. It is your responsibility and your obligation to provide for such considerations. May you figure that out. [REDACTED]

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 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.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations

Seattle, WA 98117

The proposed increase in the number of Growler jets at NAS Whidbey Island, and the proposed testing over the Olympic Peninsula to follow are unconscionable. The noise levels may cause hearing loss, not only to humans, but to many animals who will not get the memo that Olympic National Park is "closed." The jet fuel pollutants will cause increased CO2 emissions greater than that of annual averages of citizens. Why does the Navy have to do these tests over land? Which war are we preparing for?

- 1.a. Thank You
- 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
- 19.e. Naval Special Operations EA
- 4.q. Potential Hearing Loss

**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 _____
- 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 *J*

**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

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:

Coupeville, WA 98239

1.a. Thank You
12.c. Socioeconomic Impacts
12.h. Tourism

The history of the Navy's use of OLF goes back to World War II when they used to practice touchdown with prop driven planes. I can imagine those exercises as a curiosity to the local farmers. Fast forward to 2017 and jets have brought toxic noise levels and carcinogens to our pristine water supply. Central Whidbey is now home to B & B's, organic farms, art studios, bistro's, cycling, nature walks, farmers markets, etc.. Our economy and our very health is being compromised by the very people you are employed to protect. It is not unpatriotic to say so. OLF needs to be closed in favor of a place not so populated, not so environmentally sensitive, not having a tourist based economy.

Coupeville, WA 98239

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLF 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.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.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 U.S. 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.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 under is still permitted under U.S. 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

In all due respect the Navy, for legitimacy purposes, should never have done the EIS.
You have a conflict of interest. It shows in your findings and conclusions.

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act

Coupeville, WA 98239

Annusals day-night noise level (DNL) noise contours depicted in the DEIS are misleading and false 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.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

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

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 examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Coupeville, WA 98239

The DEIS claim 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 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 findings of the National Parks 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

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

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 that must be addressed and the public must be given the opportunity to comment.

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 noise levels. 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, as reflected by the land use permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residence in a noise zone 2. Whether due to wilful 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

Close OLF. The Navy conducting their own EIS is like having the fox watch the hen house. By not testing the noise in the communities and ignoring data indicating the noise created by your EA18 is detrimental to peoples health and the environment they have avoided objectivity. It is not anti-Navy or un-American to want these jets moved to another locale less populated and less environmentally sensitive. The very presence of these jets presents danger to our citizens, degrades our local economy and devalues our homes. I also believe it to be an error in judgement to keep all these jets in one place. Remember Pearl Harbor? Bottom line, close OLF.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 12.j. Property Values
- 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.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

The noise your jets create constitutes torture. Close OLF! Its a hazard to the citizens of Coupeville, our childrens education and the environment.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 3.a. Aircraft Operations
- 4.a. General Noise Modeling
- 4.m. Supplemental Metrics
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Close OLF! (please)



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1. Name [REDACTED]

2. Organization/Affiliation _____

3. Address [REDACTED], 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

I am opposed to the expansion of EA-18 Growler flight operations at OLF. The noise created by these jets makes living here unbearable. Prolonged exposure to noise levels in excess of 120 decibels & subsequent lack of sleep constitute "torture" that civilized people would not want visited on their enemies and is outlawed by the Geneva Convention. To compound the noise problem we know near the base has polluted the local water supply with carcinogenic toxins. I seek the closure of OLF as an outdated facility, inconsistent with the "Historic Preserve" an endangerment to the lives & welfare of the local citizenry, a detriment to the education of our children, & a depressant to our home values & local economy, and harmful to the environment. The jets need to be relocated to an area less populated, less environmentally sensitive.

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
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.a. General Noise Modeling
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

December 9, 2016

Dear Representative:

I am writing to express my opposition to the expansion of EA18 Growler flight operations at OLF in Coupeville, WA.. The noise created by these jets makes living in this pristine area unbearable. Prolonged exposure to noise levels in excess of 120 decibels and subsequent lack of sleep constitute “torture” that civilized people would not want visited on our enemies and is outlawed by the Geneva Convention. To make matters worse we find the Navy has polluted the local water supply with carcinogenic toxins, the extent of which has yet to be determined.

I would seek the closure of OLF as an outdated facility, inconsistent with the “Historical Preserve”, an endangerment to the lives and welfare of the local citizenry, a detriment to the education of our children, a depressant to our home values and the local economy, and harmful to our environment. The jets need to be relocated to an area less populated, less environmentally sensitive, where the economy is not based on tourism.

Sincerely,


Coupeville, WA

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
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- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 8.f. Cultural Landscape and Impacts to Ebey’s Landing National Historical Reserve

1.a. Thank You



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 Citizen of the United States

3. Address [REDACTED] , Coupeville

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

Close off to protect Coupeville population!

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

Coupeville, WA 98239

Please close OLF! The growlers are hurting the health of our children and citizens! The EIS doesn't take into account the actual loudness and vibrations the growlers cause!! Please protect the quality of life in coupeville and move the growlers to a safer location!

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.r. Nonauditory Health Effects

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

Here's what you can do to help Be Heard. Comment Deadline is January 25, 2017.
 Here's How in Five Easy Steps: 1.This is the Navy's draft EIS comment page. Copy and paste into your browser: <http://whidbeyeis.com/Comment.aspx> 2.Fill out the form (name, etc.). Under Agency/Organization put, "Abused Citizen of the USA" 3.Cut and paste one comment from below into the comment box 4.Hit Submit 5.Repeat one comment at a time for as many or all of the comments below. Re #2, if they tally by agency/organization, we want that group to show up. Re #5, that the more individual comments on a given subject the more weight they must place on that concern or problem area of the draft EIS. Note: if you prefer to send written comments via the US mail, send them to: EA-18G EIS Project Manager, Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS, 6506 Hampton Blvd., Norfolk, VA 23508 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). 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. 3.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. 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 misconstrue has to be credibly revised to properly characterize the real impacts. 5.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. 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"). 7.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. 8.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

- 1.a. Thank You
- 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
- 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
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 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.d. Environmental Health Risks and Safety Risks to Children
- 7.c. Noise Disclosure

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.

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. 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. 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 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. 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. 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. 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.

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").

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1.a. Thank You

4.r. Nonauditory Health Effects

5. 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.

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- 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 unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. 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 misconstruct has to be credibly revised to properly characterize the real impacts.

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1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

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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

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coupeville, WA 98239

8. 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

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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.

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

7. 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

1.a. Thank You

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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.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.r. Nonauditory Health Effects

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.

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 / resident / veteran / patriot

3. Address _____
Coupeville, Washington

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} 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:

The influx of Growler flights planned at this time directly impact the quality of life on whidbey Island. The Navy has worked well with the island community in the past... the current lack of regard, heavy handed approaches and disdain for island residents is a disgrace. Stand in your fellow neighbors shoes... show respect. [REDACTED]

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

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

As a [REDACTED] training program on Whidbey Island for new farmers, we urge the Navy to be more diligent in the current Environmental Impact analysis to make sure concerns about jet noise and water contamination are adequately evaluated and addressed. Not all our graduates remain on Whidbey to farm, but those that do (and their peers, especially those near Coupeville) need to be able to tend their fields without fear of damage to their health from the increased noise from the Growlers and frequency of Growler flights. We have been made aware of at least one farm that will go out of business if the proposed steep increase in flights becomes a reality. Please keep in mind that farmers are not only a part of our local food system, but they are significant contributors to the rural character that is so important to our way of life and island tourism. For Whidbey, tourism is a major economic driver, so negative impacts to tourism are negative impacts to our quality of life. Also farmers need reliably clean water for their crops and the washing of produce. Documented contamination of wells from Navy operations at Outlying Field Coupeville raises concern about an expanded Growler program. We know the Navy is committed to the safety of Americans everywhere, and trust that you will be just as diligent in looking out for our interests in our homes and farms on Whidbey Island as you are in looking out for us abroad. Thank you for considering our concerns as citizens. The Board of Directors of the [REDACTED]

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
12.e. Agriculture Analysis
12.h. Tourism
12.n. Quality of Life

Clinton, WA 98236

I submitted the following comment, but did not get confirmation that it was indeed sent. When I filled out the next form, to be added to the mailing list, I received an error message. So, to be sure you received our comment, I am resending here: As a non-profit training program on Whidbey Island for new farmers, we urge the Navy to be more diligent in the current Environmental Impact analysis to make sure concerns about jet noise and water contamination are adequately evaluated and addressed. Not all our graduates remain on Whidbey to farm, but those that do (and their peers, especially those near Coupeville) need to be able to tend their fields without fear of damage to their health from the increased noise from the Growlers and frequency of Growler flights. We have been made aware of at least one farm that will go out of business if the proposed steep increase in flights becomes a reality. Please keep in mind that farmers are not only a part of our local food system, but they are significant contributors to the rural character that is so important to our way of life and island tourism. For Whidbey, tourism is a major economic driver, so negative impacts to tourism are negative impacts to our quality of life. Also farmers need reliably clean water for their crops and the washing of produce. Documented contamination of wells from Navy operations at Outlying Field Coupeville raises concern about an expanded Growler program. We know the Navy is committed to the safety of Americans everywhere, and trust that you will be just as diligent in looking out for our interests in our homes and farms on Whidbey Island as you are in looking out for us abroad. Thank you for considering our concerns as citizens. [REDACTED]

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- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
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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 [Redacted]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)
resident, citizen, aerospace vice president (ret.)
3. Address [Redacted]
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.
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- 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
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- 12.l. Community Service Impacts
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- 4.o. Classroom Learning Interference
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- 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 would ask the Navy to carefully consider all options in working with the citizens of Whidbey Island. We are unwilling to turn the environment, birds, air quality, contamination of water and earth of this ecosystem over to complete military override. We understand the mission and training required of our air support. I ask for the respect of an alternative to destruction of this 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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Port Townsend, WA 98368

Thank you for this opportunity to write again with my concerns about increasing Growler activity on the Olympic Peninsula. As a resident of Port Townsend, I am especially concerned about the marine habitats of Puget Sound. The Navy must develop meaningful alternatives and strategies to mitigate the harm of sonar and explosives testing in the Northwest Training and Testing (NWTT) Study Area, and I am shocked that you are not worried about injuries and deaths to marine mammals. I believe the Navy should put critical marine habitats off-limits to sonar and explosives testing and schedule training to avoid times of the year when sensitive species are present in places like the Olympic Coast National Marine Sanctuary, something the scientific community has recommended as the most effective means of reducing harm. I am sure trainings for Growlers can occur while marine animals are protected, without compromising national security. Please be aware of the acoustic environment, with its impacts on marine mammals. I am concerned that the Navy has not addressed the cumulative impacts of the project on marine mammals, including ocean acidification and noise pollution. Ocean acidification decreases the sound absorption of seawater causing sounds to travel further. Already sound travels 10-15 percent further with only a change of 0.1 pH; and this change has occurred on average in the global oceans due to anthropogenic carbon dioxide. I am also surprised that your plan does not adequately consider the effects on wildlife viewing and other wildlife-dependent recreational interests. No consideration is voiced of the value lost from the harm to marine mammals that attract the public to the potentially affected areas of the Pacific Northwest. Nor does your plan address the potential economic value lost from decreased tourism (e.g., whale watching, cruise ships, etc.), particularly in those areas centered on observing whales and other marine mammals in their natural habitats. The Navy should meet its legal obligations to protect and not harm our endangered and threatened marine species. Our waters are already showing evidence of harm from climate change and the Navy's plans will only result in further deterioration of this precious resource that contributes to the economic vitality and beauty of our Pacific Northwest.

- 1.a. Thank You
- 10.m. Impacts to Marine Species and Habitat
- 12.h. Tourism
- 18.a. Climate Change and Greenhouse Gases
- 19.h. Cumulative Impacts on Biological Resources

Port Townsend, WA 98368

I have written before with my concerns, and am writing now to request a 45-day timeline extension for the Draft Environmental Impact Statement (DEIS) on the addition of 36 more Growlers to the Navy's fleet on Whidbey Island. My greatest concerns have to do with the affects of more noise on residents of Port Townsend and Whidbey Island and the effects of more noise on marine mammals in our area and terrestrial mammals in the Olympic Peninsula. Thank you.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Coupeville, WA 98239

Re: Code EV21/SS Increase in touch and go flights at Whidbey Island Navy Outlying Field in Coupeville, WA. The noise levels created by flights of the Growlers are damaging to human beings animals and wild life. It's important to recognize these facts: 1) The touch/goes do influence pilot readiness and hence national readiness, but conducting those 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. 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. 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. 4) OLF operations violate FAA elevation rules and, as backed up by the Supreme Court, represent an illegal taking of airspace over our homes and AC property. (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.) 5) Then there is the impact on our economy and property values.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 3.i. Runway Operating Hours and Flight Schedules
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.q. Potential Hearing Loss
- 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;** 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 really I would like the navy
 to relocate to an area that is
 not populated.
 The militarization of our pristine
 environment is unacceptable.
 It feels like our society is getting amped
 up, violent, and aggressive.
 What is important for life to exist?
 The simple, basic things like silence,
 hearing nature, hearing our own thoughts.

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
- 2.n. Alternatives Considered But Eliminated
- 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.

The U.S. is one of the aggressors in the world. we need to deescalate, reduce bases around the world. Create civilian jobs for veterans, help our own crumbling infrastructure.

I am expressing these things in vain - as in Stand in Power, veterans can stand with the people. Sometimes the people at the top are out of touch and too entrenched to care for the common good.

Peace can happen if the people taking orders, question those orders

as always there is no separation between you and me. I desire a good resolution between all people and beings affected by noise and environmental pollution



For more information, please visit the project website at 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

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.f. Economic Hardship and Impacts
- 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.n. Speech Interference (Indoor and Outdoor)
- 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

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 own horses on the south end of Lopez Island
and run an [REDACTED] practice there.
When the Growlers fly over, I have to stop
the session because I cannot hear my client
nor can they hear me, which could actually
result in a dangerous situation. An occasional
fly over is tolerable. An increase in what we
have now would be highly disruptive and unsafe for
my practice.

01/08/16

www.QuietSkies.info

Thank you for your consideration

1.a. Thank You

Victoria, British Columbia V8X 2Z2

I find the noise loud and scary, and it lasts all day sometimes. The sound seems to be reflecting off a nearby hill.

Coupeville, WA 98239

Attn: Code EV21/SS Growler noise levels and damages to humans and animals and the economy of the area around Navy Outlying Field at Coupeville, WA Water contamination to sole-source aquifer is not adequately addressed. Actual noise measurements were not made. Noise modeling is outdated and noise averaging inappropriate. Noise levels above 100db result in instant damage to the hearing of individuals. Repeated exposure increases the damage resulting in hearing loss. Individual measurements made by National Park Service show noise levels far in excess of that predicted by average modeling. A person using cheap headphones with a level of music at 100db has measurable permanent hearing within 15 minutes. Alternatives to using the Coupeville OLF were not adequately addressed. Jet noise reduction options are not thoroughly considered. Crash frequency and impacts are not addressed. Impact on our children is not adequately addressed: Childhood learning disability and hearing damage; Impact on students at Coupeville Schools; Impact on children, as well as parents and coaches, playing ball at Rhododendron Park. Economic impact on tourism, property value loss, decline in population, and loss of business is not addressed adequately. 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. Frequency and effects of fuel dumping not addressed as well as the pollution caused by the jet engines of unburned and partially burned fuel. It is not just the noise people are complaining about it is the damages being done to our citizens because of the level of the noise. It is not acceptable to harm our citizens so we can get our military ready for a war halfway around the world.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 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
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 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.e. Lack of First Responders at Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.g. Ebey's Landing National Historical Reserve

COUPEVILLE, WA 98239

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
12.h. Tourism
12.j. Property Values

Thank you for the opportunity to comment on the EIS for the Navy's proposed Growler expansion at NAS on Whidbey Island, WA. I am a [REDACTED] for the Island County Historical Society & Museum located in Coupeville and also serve a [REDACTED] for the Penn Cove Water Festival held every mid-May also in Coupeville. The Water Festival brings our Salish Native American neighbors and the Whidbey Island community together for native canoe races and cultural exchanges. The Salish people have lived here on Whidbey for 10,000 years. They were moved to reservations in the mid-1800s but our town has kept a very unique connection to the various Salish tribes over the years. The Water Festival began in Coupeville in 1930, was discontinued at the beginning of WWII and resumed in 1991. We are celebrating our 26th Anniversary this year. Attendance is in the thousands from all over the State of Washington. My concerns are about the increase in proposed over flights on central Whidbey and the issue of contaminated water in our wells. The increase in flights has been an ongoing issue here. Just how many more flights can central Whidbey take without it affecting our health and our economic base which is to a large extent based on scenic tourism and historical heritage tourism. We are located in the heart of the Ebey's Landing National Historical Reserve, an area set aside by a joint effort of local farming community and the National Parks in the 1970s. The Reserve is an historical treasure and brings thousands of tourists to central Whidbey every year. The business in our town thrive because of interest of our visitors in the scenic beauty as well as the preservation of its historical nature. Increased flights and contaminated water are a danger to our community's ability to continue to thrive. Many unanswered questions and concerns arise regarding our situation. 1). Noise Issues: With the proposed flight increases we are concerned that the increased noise level and noise affected areas will increase and be found unacceptable by our visitors and Whidbey will no longer be a tourist destination there by affecting our community's economic survival. The health dangers of the noise levels were just reported in our local newspaper, The Whidbey News Times, this week. Children are especially affected. 2). Water contamination: Water contamination is scary to us all. I stood just a few feet behind a retired Navy doctor recently, retired from NAS Whidbey, who lives in Coupeville as he explained how the water contamination has turned his life upside down. His well is contaminated beyond any safe level. He explained that his own blood level of PFOAs is somewhere in the 400s (safety level at present is in the 70s I believe) and he is facing an uncertain and scary health future. The NAS Whidbey is providing bottle water for him only for drinking. He can no longer sell his home so he has lost all the equity that he has and his future economic security. I and my spouse depend on the value in our home to meet any long term nursing home care we might need in the future. If we were unable to sell our home that it would be an economic disaster for us. Safety levels for this chemical have been revised down a number of times in the past and thus our concern that they may be revised down again the future with all of the accompanying consequences. I also have concerns and questions regarding any future use of stockpiled PFOAs that NAS Whidbey may currently have. If there were to be another fire would the old PFOA chemicals still be used or has the stockpiled chemical been destroyed and replaced with he newer safe fire retardant that I have heard is available? My brother-in-law's barn caught fire many years ago. Fire trucks from NAS Whidbey assisted our local volunteer

firefighters to put out the blaze. They used fire retardants containing PFOAs at that time. With all of the current attention to the PFOAs my brother-in-law's son had their well tested recently. The PFOA level is somewhat above the current safety level I am told. If anyone's well is contaminated with PFOAs will the Navy pay for installing a proper filter to screen out this chemical? I have not heard what the health repercussions are for a high percentage of PFOA contamination even if it is under the supposed current safety level. Our great nephew's wife is presently pregnant with twins. They are on Coupeville city water. Will that affect her and the twins? There are those individuals and actually two County Commissioners who have accused the entire Coupeville Community of being anti-Navy because we have expressed our concerns about noise and water issue. This accusation is ridiculous and certainly not true. We are merely concerned and afraid as to how these two issues will be worked out. I urge you to address these important questions and concerns. Again thank you for the opportunity to respond to the EIS for the NAS Whidbey. [REDACTED]

Anacortes, WA 98221

01/13/17 www.QuietSkies.info Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex January 2017 Detailed Comments 1. According to the Navy, "The Growler is recognizable by the low frequency "rumble" of its jet engines." Nevertheless, low frequency noise impacts are ignored in the Draft EIS. Section 3.2 - Noise Associated with Aircraft Operations - makes no mention of the signature low frequency noise of the Growler. All of the noise analysis is based on A-weighted sound (dBA), which ignores the lower frequencies, and is therefore deficient.

http://www.cnrc.navy.mil/regions/cnrnw/installations/nas_whidbey_island/om/environmental_support/growlerfact.html Nevertheless, the Draft EIS at 4-194 states "... the 2012 study included a brief examination of low-frequency noise associated with Growler overflights at 1,000 feet AGL in takeoff, cruise, and approach configuration/power conditions ... The study found that takeoff condition ... overall C-weighted sound level of 115 dBC. The Growler would exhibit Cweighted sound levels up to 101 dBC when cruising and 109 dBC (gear down) at approach." Page 4-193 states "According to Hubbard (1982), a person inside a structure can sense noise through vibration of the primary components of a building, such as the floors, walls, and windows; by the rattling of objects; ..." The World Health Organization "Guidelines on Community Noise" (Berglund, 1999) states: "When prominent low frequency components are present, noise measures based on Aweighting are inappropriate;" "Since A-weighting underestimates the sound pressure level of noise with low frequency components, a better assessment of health effects would be to use C-weighting"

<http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf> Closing windows and doors provides limited reduction for low frequency noise entering a building as measured by sound Transmission Loss tests. Therefore assumptions throughout the Draft assuming an average noise level reduction across the frequency spectrum with windows closed are not based on scientifically observed behavior of low frequency sounds. See graph on <http://windowanddoor.com/article/04-april-2007/understanding-basics-sound-control>

RECOMMENDATION: Evaluate impacts of the Growlers at low frequencies using Cweighting (dBC) in addition to A-weighting (dBA). 2. The Draft EIS states (page 3-16) that aircraft noise levels represented in this draft EIS are "generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville." It further states that the computer model draws from "a library of actual noise measurements" (page 4- 20). There is no documentation on whether Growler measurements were used or if the model is based on another jet. We also do not know the conditions for the measurements, e.g. engine power, afterburners, distance, orientation, etc. For more information on this issue see Sections 2 and 3:

http://media.wix.com/ugd/f9226a_af2c68d0670d466591fbd7f062bab13.pdf 01/13/17 www.QuietSkies.info 2 RECOMMENDATION: Provide the noise measurement data used for simulation and an explanation of how the data was captured and processed. Provide Growler noise measurements with afterburners in one-third octave bands at various distances and orientations from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. The Draft EIS states (page 3-16) "The computer modeling program used for this EIS is NOISEMAP Version 7.2

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 19.a. Scope of Cumulative Analysis
- 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.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

(October 29, 2015), developed by Wyle Laboratories. ...The U.S. Department of Defense (DOD) uses NOISEMAP as the accepted standard noise modeling program for assessing potential noise exposure from fixed-wing aircraft." A 2004 study performed by Wyle for DOD states "The latest NOISEMAP package of computer programs consists of ... NOISEMAP Version 7.2 ..." The version used in the Growler EIS is at least 12 years old, not a year old. <http://www.nctcog.org/trans/aviation/jilus/noisestudy04.pdf> The 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." SERDP project WP-1304, led by Principal Investigator Dr. Kenneth Plotkin of Wyle issued a final report titled "Advanced Acoustic Models for Military Aircraft Noise Propagation and Impact Assessment" in 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 GE F414 jet engine as the Growler] differs from those of most prior aircraft, with high noise levels associated with higher thrust engines. ..." "Moreover, the ... 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 ... model that produces more physical realism and detail than traditional ... model."

<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304> For more information on this issue see Section 1 - http://media.wix.com/ugd/f9226a_af2c68d0670d466591fbdd7f062bab13.pdf

RECOMMENDATION: Redo the noise level simulation using the more recent Advanced Acoustic Model. 4. Day-Night Noise Level (DNL), the fundamental noise metric in the Draft, represents "the energy-averaged sound level measured over a 24-hour period" (Section 3.2.2.1). An FAA study, "Technical Support For Day/Night Average Sound Level (Dnl) Replacement Metric Research," finds "... DNL has another major practical limitation. It doesn't work particularly well as a predictor of aircraft noise impacts. FICON's 1992 relationship accounts for less than a fifth of the variance in the association between aircraft noise exposure and the prevalence of high annoyance in communities (Fidell, 2003; Fidell and Silvati, 2004)."

https://www.faa.gov/about/office_org/headquarters_offices/apl/research/science_integrated_modeling/noise_in

[pacts/media/6-14-2011_FinalReport_MetricsMestre_etal_061411_part1.pdf](https://www.faa.gov/about/office_org/headquarters_offices/apl/research/science_integrated_modeling/noise_in_pacts/media/6-14-2011_FinalReport_MetricsMestre_etal_061411_part1.pdf) 01/13/17 www.QuietSkies.info 3 The Day-Night Noise Level (DNL) was developed for the FAA to establish a threshold for annoyance at commercial airports with typical operations 16 hours a day, 7 days a week. The noise events experienced during Growler training flights is intermittent in a region with very low background noise. The noise assessment in the Draft instead spreads the annual training operations over 365 days to calculate Annual Average Daily (AAD) day and night events (at 4.2 on page A-35). In actual experience these events are concentrated into some number of days in a year, which is not specified in the analysis. We use actual data below to demonstrate this. Figure 4.1 shows training flights from Ault Field in 2014 using data provided by the Navy. Ault Field has significant impact on San Juan County. Included are weekly totals of Field Carrier Landing Practice (FCLP) and Controlled Carrier Approach (CCA) activities. The FCLP is the focus of the Proposed Action (page ES-1). Flying is intermittent and concentrated into certain periods.

The maximum number of weekly flights was 1088. On the other hand there were 16 weeks with no flights and 25 weeks, or half of the year, with fewer than 100 flights. There were 13,422 flights reported in 2014. Spread over 52 weeks in a year that yields an average of 258 flights per week. Considering only the 27 weeks with more than 100 flights there were an average of 497 flights per "active flying week." During "active flying weeks" citizens experienced 93% more jet noise impacts than an annual average portrays. San Juan County collects Growler noise reports from citizens (see Comment 6). Figure 4.2 is a chart of the daily reports from 2016. The number of reports over an hour, day, week or other period indicates a level of annoyance. Looking at the daily variability, impact on citizens in San Juan County is clearly intermittent. The maximum number of noise reports in one day was 75. There were 112 days with no reports. Assume that a day with 5 or fewer reports represents limited annoyance. There 0 200 400 600 800 1000 1200 J F M A M J J A S O N D FCLPs + CCAs Month 2014 Ault Field Weekly Training Flights Figure 4.1 01/13/17 www.QuietSkies.info 4 were 242 days with 5 or fewer reports. That leaves 124 days with significant annoyance, or about one-third of the year. Averaging significant noise events over 365 days rather than 124 days greatly diminishes the impact citizens experience when Growlers are flying. Both the Navy flight data and citizen noise reports paint the same picture. Growler noise events are intermittent. While commercial airports have busy periods at certain times of the day, they are active 365 days a year. Growler training flight activity at Ault Field has extended quiet intervals, lasting for days or even weeks. When Growler flights resume after a quiet period the noise is startling, increasing the annoyance. Averaging Growler noise events over 365 days when the events are intermittent assumes that quiet days mitigate the noisy days. No scientific evidence is provided in the Draft to support that assumption. The averaging inherent in the DNL metric developed for commercial airports is inappropriate for analysis in the Draft. Averaging over the year greatly underestimates the impacts on citizens and leads to an incorrect conclusion that the region is not significantly impacted by the Proposed Action. Under all the Alternatives, Total Operations increase by 47% over the No Action Alternative (Table 2.3-1). The DNL metric is inappropriate for understanding the consequences. RECOMMENDATION: For averaged noise metrics, noise levels should only be averaged over active flying days. 5. The Draft EIS at 3-22 states "No studies have shown a definitive causal and significant relationship between aircraft noise and health. Inconsistent results from studies examining noise exposure and cardiovascular health have led the World Health Organization (WHO) (2000) to conclude that there was only a weak association between long- term noise exposure and hypertension and cardiovascular effects." 0 20 40 60 80 J F M A M J J A S O N D Daily Noise Reports Month 2016 Growler Noise Reports San Juan County Figure 4.2 01/13/17 www.QuietSkies.info 5 The statement above disagrees with multiple findings in the WHO "Guidelines on Community Noise" (Berglund, 1999): "For a good night's sleep, the equivalent sound level should not exceed 30 dB(A) for continuous background noise, and individual noise events exceeding 45 dB(A) should be avoided." "For noise with a large proportion of low frequency sounds a still lower guideline is recommended" "It should be noted that a large proportion of low frequency components in a noise may increase considerably the adverse effects on health" "The evidence on low frequency noise is sufficiently strong to warrant immediate concern" Waye (2004) finds "As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings. Sleep disturbance, especially with regard to time to fall asleep and tiredness in the morning, are commonly reported in case

studies on low frequency noise. However, the number of studies where sleep disturbance is investigated in relation to the low frequencies in the noise is limited. Based on findings from available epidemiological and experimental studies, the review gives indications that sleep disturbance due to low frequency noise warrants further concern." <http://www.noiseandhealth.org/text.asp?2004/6/23/87/31661> Specific guidelines are found in the "WHO Night Noise Guidelines for Europe" (2005), Table 5.1, "Summary of effects and threshold levels for effects where sufficient evidence is available." http://www.euro.who.int/__data/assets/pdf_file/0017/43316/E92845.pdf During Scoping 1785 comments were submitted on Noise and Vibration and 914 on Health Effects (Table 1.9-5). Under all the Alternatives, Total Operations increase by 47% over the No Action Alternative (Table 2.3-1). The Navy has not demonstrated that there are no health impacts from the proposed Growler additions. RECOMMENDATION: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise", "Night Noise Guidelines for Europe" and other published studies. 6. The Draft includes some independent noise measurements and ignores others. Section 1.9.5 states "The Navy continues to evaluate noise reports that have been developed by independent sources and review their findings in conjunction with this EIS analysis." Not included in the Draft EIS is data collected by San Juan County (SJC) Data collected since May 14, 2014 has been regularly sent to NASWI. More than 6000 citizen reports include date, time, location and noise characteristics. See a sample chart in Figure 6.1. The Navy should correlate that data with the information they collect on flight tracks to understand what activity causes disruptive noise in SJC. Actual noise reports and measurements should be used to benchmark the computer modeled noise impacts relied on for decision-making. Noise reports can also help to understand the benefits of mitigation measures. <http://sjcgis.org/aircraft-noise-reporting/01/13/17> www.QuietSkies.info 6 Also not included is the study sponsored by Citizens of Ebey Reserve. They engaged an independent noise study by JGL Acoustics in 2013 to obtain actual on-site Growler noise data at Outlying Field Coupeville because "rather than simply accept the computer-modeled data used by Wyle Labs because we believed on-site validation was critical." [http://citizensofebeysreserve.com/References/Files/JGL Noise Report.pdf](http://citizensofebeysreserve.com/References/Files/JGL%20Noise%20Report.pdf) RECOMMENDATION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft EIS suggests that the lands and waters of the San Juan Islands National Monument are exempt from National Environmental Policy Act protection because the 2013 proclamation establishing the Monument 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 only has the effect of preserving the status quo: 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 Monument area from federal laws that already applied to wildlife there. Hence creation of the Monument did not exempt the Navy from NEPA or Endangered Species Act with respect to wildlife in the Monument, such as Marbled Murrelets or marine mammals. At 3.5.2.4 the Draft EIS acknowledges "However, the Bureau of Land Management (BLM) has determined that BLM-owned and controlled lands in the San Juan Islands National Monument possess wilderness characteristics." It also concedes that the Monument is subjected to a maximum noise level of 95 dB (SEL) an estimated 372 times per year (at 3-34). For more information on this issue see

http://media.wix.com/ugd/f9226a_c2a40618270749a4b74a6d43bb2a19c3.pdf 259 357
 765 922 188 389 794 1176 0 200 400 600 800 1000 1200 1400 Low Rumble Disrupted
 Activities Rumble and Vibration Extremely Loud Jet Noise Report: Loudness Comparison
 by Year 2015 2016 San Juan County Figure 6.1 01/13/17 www.QuietSkies.info 7
 RECOMMENDATION: 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. In
 2014 the Department of Defense successfully demonstrated carrier takeoff, landing, and
 formation flying capabilities of the X-47B prototype (“drone”) that is part of the Unmanned
 Carrier-Launched Airborne Surveillance and Strike (UCLASS) program.
[http://breakingdefense.com/2014/08/x-47b-drone-manned-f-18-take-off-land-together-in-h](http://breakingdefense.com/2014/08/x-47b-drone-manned-f-18-take-off-land-together-in-historic-test)
 historic-test The UCLASS jets can meet the Purpose and Need, delivering the same
 capability for electronic surveillance and attack against enemy radar and communications
 systems as the Growlers. This Alternative has many benefits. Because of its inherent
 automation UCLASS would significantly reduce the amount of land-based training that
 impacts our region. It eliminates the high risk to the Growler's two-person crew from
 advanced anti-aircraft threats. The smaller UCLASS vehicle is lighter and uses less fuel.
 Eliminating the \$3 billion purchase of 36 Growlers will save taxpayer money. Navy
 Secretary Ray Mabus said “[the F-35] should be, and almost certainly will be, the last
 manned strike fighter aircraft the Department of the Navy will ever buy or fly.” With a
 focused effort the Navy can deploy the UCLASS while the existing 82 Growlers plus
 spares carry out the mission. RECOMMENDATION: 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 (see Section 3.10.2). San Juan and Jefferson Counties are
 excluded from the socioeconomic impacts analysis but sites in those Counties appear in
 the Points of Interest (Figure 3.2-6) and experience significant Single Event Noise
 (Tables 3.2-4 through 3.2-8). Clallam County may also be impacted by Growler noise but
 no noise analysis was done for this area. The San Juan County Comprehensive Plan
 states “...the islands are places of peace ... We support a pattern of economic
 growth...which recognizes the rural, residential, quiet, agricultural, marine, and isolated
 nature of the islands.” Anecdotal evidence from San Juan County realtors is that property
 sales have been lost due to Growler activity. The three counties excluded from the
 socioeconomic analysis are very dependent on outdoor recreation that is being harmed
 by Growler flight activity. These Counties receive little, if any, economic benefit from
 employment and other activity associated with NASWI. RECOMMENDATION: Examine
 socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam
 Counties. 10. At 1-20 the Draft EIS discusses Noise Mitigation. The only cited measure in
 place is “to share flight schedules and other information and to solicit public feedback.”
 Potential measures include construction and operation of a noise suppression facility for
 engine maintenance (Hush House), Engine Chevrons (noise reduction) and MAGIC
 CARPET (automating parts of carrier landing which will reduce FCLP training activity).
 01/13/17 www.QuietSkies.info 8 Further discussion on Existing Mitigation at 3-30 states
 “NAS Whidbey Island has noiseabatement procedures ... to minimize aircraft noise.
 Airfield procedures used to minimize/abate noise ... include optimizing of flight tracks,
 restricting maintenance run-up hours, runway optimization, and other procedures ...
 Additionally, aircrews are directed, to the maximum extent practicable, to employ prudent

airmanship techniques to reduce aircraft noise impacts and to avoid sensitive areas except when operational safety dictates otherwise." Each Alternative is an irrevocable decision to add 35 or 36 Growlers at NASWI. Therefore the Navy should commit to Mitigation Measures as part of the Final EIS and Record of Decision. Since experts have identified the need for additional research on health effects of low frequency noise the Navy should sponsor this research. RECOMMENDATION: 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 as described in the comments above and by others, and is inadequate to support a decision. Council on Environmental Quality (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." RECOMMENDATION: Supplement the EIS to address deficiencies identified in comments and allow further opportunity for public comment before the Final EIS is prepared. QuietSkies.info 02/12/17 Failing to Address the 40 Additional Growlers at NASWI in the Draft EIS The Draft Environmental Impact Statement (EIS) is deficient in not addressing 40 Growlers now being delivered beyond the 35 or 36 identified in the Proposed Action. The Draft EIS states that The Proposed Action would: • continue and expand existing Growler operations at the Naval Air Station Whidbey Island complex, which includes field carrier landing practice by Growler aircraft that occurs at Ault Field and Outlying Landing Field Coupeville • increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment The Environmental Impact Statement evaluates the potential environmental impacts associated with the following resource areas: airspace, noise, safety, ... , as well as the cumulative impacts of the Proposed Action and other local projects. [emphasis added] 1 The Draft also states that the total number of Growler Aircraft at Ault Field will be 117 or 118.2 A Department of Defense (DoD) report from 2016 states The procurement profile of the FY 2017 PB adds 7 EA-18G aircraft in FY 2016. The result of this addition will be a FY 2016 FRP contract for Lot 40 EA-18G aircraft, which increases the total Program of Record (PoR) from 150 to 157. ... 3 These aircraft are in the process of delivery ... 3 Initial aircrew training will be conducted at NAS Whidbey Island, WA. ... Limited I-Level for some EA-18G and F/A-18E/F common maintenance tasks has been established at Whidbey Island, WA. Airborne Electronic Attack (AEA) I-Level maintenance will be stood up at Whidbey Island and aboard the CVWs commencing FY18.4 It is clear from the DoD report that 157 Growlers will be based at NASWI at times, not 117 or 118 as described in the Draft EIS. The additional 40 Growlers are part of the same mission and are "in the process of delivery." The Draft does not acknowledge the additional 40 Growlers, describe what activity they will undertake or analyze how that activity will impact the affected environment. We have been verbally told that they are "only spares." For example, will maintenance engine run-ups be conducted on the additional Growlers? 1 Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex Volume 1, pg. Abstract-1 2 ibid, Table 2.3-1 3 Selected Acquisition Report (SAR), RCS: DD-A&T(Q&A) 823-378, EA-18G Growler Aircraft (EA-18G), As of FY 2017 President's Budget, March 17, 2016, pg. 7. <https://goo.gl/IQrY4K> 4 ibid, pg. 37 QuietSkies.info 02/12/17 The Draft EIS has not fulfilled its obligation to "evaluate[s] the potential environmental impacts ... as well as the cumulative impacts of the Proposed Action and other local projects." Council on Environmental Quality (CEQ) Regulation 1502.9 states (c) Agencies: (1) Shall prepare

supplements to either draft or final environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

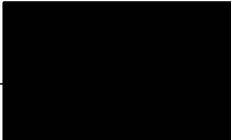
RECOMMENDATION: Supplement the EIS to address the 40 additional Growlers to be stationed at NASWI and allow further opportunity for public comment before the Final EIS is prepared.

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, 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
- 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

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

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.

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, 6th 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

Clinton, WA 98236

- 1.a. Thank You
- 4.q. Potential Hearing Loss
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

I experienced firsthand how literally deafening Loud these plains are. I was in a field getting hay when your growlers flying in what appears to be an approach to the navel base. I had to jam paper into my ears and it was still too way too Loud. I work with tractors and experience loud ...and this was by far off the charts. I feel this is unconscionable to subject people and animals, livestock to this damaging noise

1.a. Thank You

Langley, 98260

More war? Please stop war and reduce military spending. Whidbey does not need more air noise.

SEQUIM, WA 98382

OBJECTION Pacific Northwest Electronic Warfare District Ranger [REDACTED] I am requesting the Growler EA-18G increase to be reevaluated for conflict of information concerning noise pollution, natural habitat destruction, and the effects of Electronic Radiation Warfare on the Olympic National Forest.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted

BEAVERTON, OR 97005

- 1.a. Thank You
- 2.e. Public Involvement Process

As a new resident to Sequim, Wa. I was never told about EIS in making my decision on purchasing my home. I would not have bought here if known. I highly oppose this noise issue and feel that the community was not appropriately informed to make a fair decision for our best interests of the environmental impact in our area.

Sequim, WA 98382

I oppose NWTRC and the bioeffects of EW in the PNW. I have read over your documents stating no effects on people, animals, and land. This is an obviously false study with no sound evidence. The solution to this would be to keep your training where it is and spend a few more dollars on fuel. Thousands of people will be affected by the noise pollution and our ONF will be destroyed. The effects of the radars will bring danger to hikers, campers, or any one who gets too close unknowingly.

1.a. Thank You
19.d. Electronic Warfare
2.k. Range of Alternatives
4.s. Health Impact Assessment and Long-term Health Study
Requests

1.a. Thank You

Seattle, WA 98116

Protect the environment, first and always....this is precious and irreplaceable. Stop expanding into this protected land.



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

2. Organization/Affiliation

3. Address Lopez Island 98261

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 modeling done to date is out-of-date & flawed.
 PLEASE do noise modeling that takes into account
 actual circumstances on the ground!
 It is deafening!!!

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.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.f. Noise Measurements/Modeling/On-Site Validation

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. 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." 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.

Clinton, WA 98236

1.a. Thank You

12.i. Housing Access and Affordability

I support the EA-18G Growler Airfield Operations. I also believe that the personnel of NAS Whidbey require more housing units on Whidbey Island, and urge you to consider helping facilitate more housing units of quality.

Friday Harbor, WA 98250

██████████ Friday Harbor, WA 98250 Jan. 9, 2017 EA-18G Growler EIS
 Project Manager Naval Facilities Engineering Command Atlantic 6506 Hampton
 Boulevard Norfolk, VA 23508 Attn: Code EV21/SS Dear Sir or Madam: In your review of
 the EA-18G Growler DEIS, please consider the following. 1. A Decision on the DEIS, and
 the close of the comment period, should be delayed pending further information on
 Groundwater Contamination near OLF. One of two drinking water wells at the OLF was
 found contaminated with perfluoroalkyl (PFAS) substances on Oct. 11. Earlier sampling
 of groundwater at the Navy's Ault Field installation revealed high levels of PFAS and
 other toxic substances.
<http://www.sanjuanjournal.com/news/whidbey-group-calls-for-navy-site-closure-after-aqui-fer-contamination/> This information does not appear in the DEIS, despite its obvious
 relevance to the proposed increase in Growler operations. The extent of the
 contamination should be determined and considered in the DEIS. Accordingly, both the
 comment period and any decision on the DEIS should be delayed until the additional
 information is available. 2. The DEIS does not contain any information on the effect of
 increased Growler activity on the western Olympic Peninsula. As noted in the DEIS, a
 purpose of the increase in Growlers is "to support an expanded U.S. Department of
 Defense mission for identifying, tracking, and targeting in a complex electronic warfare
 environment." ES-1. Essentially, the Growlers will fly low over areas of the western
 Olympic Peninsula, interacting with mobile wireless transmitters on the ground.
<https://www.fs.usda.gov/project/?project=42759> This is an entirely new activity, in an
 entirely new area, which will affect people, wildlife, and recreational areas that are not
 currently affected by Growler activity. Yet the DEIS contains no information about
 environmental effects, especially noise pollution, on any area of the western Olympic
 Peninsula. The western-most point covered by the DEIS is Port Angeles. The area to be
 affected, including Forks and Quinault is about 60 miles west (Forks) , and 60 miles south
 (Quinault) of Pt. Angeles. There is no separate EIS covering the National Forest permit
 for this activity; instead the DEIS relies on a 2014 EA, which itself relies on a 2010 EIS
 covering the existing number of Growlers. ES-1-10. However, the increase in Growler
 activity---the subject of this DEIS--- will create new environmental effects. There is
 absolutely no data in the DEIS from which to judge the effects on wildlife, humans, or
 tourism caused by more Growlers flying to and from the northwest of the Olympic
 peninsula---whether up the Strait of Juan de Fuca, over the Olympic National Park, or
 over coastal areas--- and then flying low over the National Forest to engage in electronic
 warfare training. This is a huge flaw in the DEIS. 3. The DEIS does not adequately
 identify flight patterns for the additional Growlers. The proposed action will result in a
 46-47 percent increase in flight operations, or, in numerical terms, 40,100 - 41,400
 additional flight operations per year (which averages to 112 more each day). ES-4.
 Where are all those additional flights going to fly? The DEIS seems to assume that they
 will fly where existing Growlers do, though this is difficult to believe given the limitations of
 time, space, and acceptable flying weather. In my experience, Growler flights over my
 house on south San Juan Island are occasional, which suggests to me that they do not
 stick to specific flight paths. Any new flight paths should be identified specifically so that
 their effects on people, wildlife, and tourism can be accurately assessed. My husband

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 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.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 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.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

and I are talking about moving because of the threatened increase in Growlers; if we're going to have an increase in overflights, we should definitely sell our house. The DEIS gives no hint about whether there will be additional overflights because it does not identify new flight paths or even (that I could find) show where the existing flight paths are. 4. The DEIS does not identify areas newly affected by Growler noise. The following statement appears on ES-5 There would be new areas impacted by noises that are not currently within the 65dB DNL noise contour generated by Navy aircraft operations under all alternatives. This cryptic reference to "new areas impacted" by Growler noise is never explained. Perhaps it refers to the Olympic Peninsula war games. Perhaps it refers to new unidentified flight paths. Perhaps it refers to something else. As discussed below, there are plenty of places outside the arbitrary 65dB noise contour that are currently affected by Growler noise and that will no doubt suffer more from a 50% increase in flight operations, but where are the new areas that will be impacted by noise? And how could a DEIS possibly be adequate that does not identify those new areas and the effects within them? 5. The DEIS' reliance on decibels fails to account for the effect of the Growler's frequency. The DEIS identifies 65 decibels (dB) as the sound level above which 87% of the population will be highly annoyed. ES-5. This standard does not, however, account for the peculiarly nasty quality of the Growlers' low frequency, which can be physically felt and which sounds like an earthquake or explosion. The following sample (and it is only a sample) of comments from the last month or so of the San Juan County noise reporting website (sjgis.org/airplane-noise-reporting) documents the quality of Growler noise: A huge explosive roar, shaking the room, rattling windows and items on shelves. An earthquake experience courtesy of NAS Whidbey. The Navy's practices are effectively destroying U.S. citizens quality of life the NAVY purports to protect. 2017 01-08 Lopez Island The engines were rumbling - super loud and disruptive. At times ear splitting loud and bodily painful. This went on all week long. I am on a construction site so no time to record each one but overall it was very disturbing. 2016 12-12 to 12-16 Lopez Island Rumbling all day long at our job site. Even wearing hearing protection, the rumbling was non stop and we could hear and feel it 2017-01-06 Lopez Island At the ferry Dock this morning, a wave of jet roaring was heard and felt. A really big blast. 2017-01-06 Lopez Island Very loud low frequency jet engine noise. Walls are shaking. Loudest at frequencies below 100Hz. Going on since before 0850. 2017-01-08 Lopez Island Hoping for a quiet hour to walk. No luck. At least 12 huge blasts connected by roars. THIS IS A WAR TRAINING ZONE. THIS IS INSANE! 2016-11-18 Lopez Island Awful roaring. Sound overwhelms all else in the environment, inside and out. Sound and vibrations are penetrating, rattling bones as well as structures. AWFUL NOISE and VIBRATION. 2017 01-01-08 Cape San Juan San Juan Island Did the Trout Lake Dam burst? Is there a chimney fire? Are we having an earthquake? No, it is the reassuring sound of freedom 2016-12-12 Mid San Juan Island I live at Cattle Pt. on San Juan Island, quite close to what the DEIS calls San Juan Islands Visitors Center (it's the visitors center for American Camp National Historical Park). Table 3 .2-4, page 3-34 shows this location as having a dB level of 63, just under what is supposed to be annoying. Primarily we are subjected to run-up noise, with occasional terrifying overflights. The run-up noise is loud enough to cause visitors to say "what was that!" and rattle the pictures, but the really awful part is the menacing low frequency. This sounds like an earthquake, or a tsunami, or a freight train a block away. It is a noise that makes my heart speed up even though I know consciously what it is. It is felt as well as heard. The DEIS' emphasis on decibels fails to recognize the effects of frequency. 6. The DEIS' conclusions conflict with the DEIS' data.

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Friday Harbor, WA 98250

Jan. 9, 2017

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

Dear Sir or Madam:

In your review of the EA-18G Growler DEIS, please consider the following.

1. A Decision on the DEIS, and the close of the comment period, should be delayed pending further information on Groundwater Contamination near OLF.

One of two drinking water wells at the OLF was found contaminated with perfluoroalkyl (PFAS) substances on Oct. 11. Earlier sampling of groundwater at the Navy's Ault Field installation revealed high levels of PFAS and other toxic substances. <http://www.sanjuanjournal.com/news/whidbey-group-calls-for-navy-site-closure-after-aquifer-contamination/> This information does not appear in the DEIS, despite its obvious relevance to the proposed increase in Growler operations. The extent of the contamination should be determined and considered in the DEIS. Accordingly, both the comment period and any decision on the DEIS should be delayed until the additional information is available.

2. The DEIS does not contain any information on the effect of increased Growler activity on the western Olympic Peninsula.

As noted in the DEIS, a purpose of the increase in Growlers is "to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment." ES-1. Essentially, the Growlers will fly low over areas of the western Olympic Peninsula, interacting with mobile wireless transmitters on the ground. <https://www.fs.usda.gov/project/?project=42759> This is an entirely new activity, in an entirely new area, which will affect people, wildlife, and recreational areas that are not currently affected by Growler activity. Yet the DEIS contains no information about environmental effects, especially noise pollution, on any area of the western Olympic Peninsula. The western-most point covered by the DEIS is Port Angeles. The area to be affected, including Forks and Quinalt is about 60 miles west (Forks), and 60 miles south (Quinalt) of Pt. Angeles. There is no separate EIS covering the National Forest permit for this activity; instead the DEIS relies on a 2014 EA, which itself relies on a 2010 EIS covering the existing number of Growlers. ES-1-10. However, the increase in Growler activity---the subject of this DEIS--- will create new environmental effects. There is absolutely no data in the DEIS from which to judge the effects on wildlife, humans, or tourism caused by more Growlers flying to and from the northwest of the Olympic peninsula---whether up the Strait of Juan de Fuca, over the Olympic National Park, or over coastal areas--- and then flying low over the National Forest to engage in electronic warfare training. This is a huge flaw in the DEIS.

3. The DEIS does not adequately identify flight patterns for the additional Growlers. The proposed action will result in a 46-47 percent increase in flight operations, or, in numerical terms, 40,100 - 41,400

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 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.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives
- 3.a. Aircraft Operations
- 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.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

additional flight operations per year (which averages to 112 more each day). ES-4. Where are all those additional flights going to fly? The DEIS seems to assume that they will fly where existing Growlers do, though this is difficult to believe given the limitations of time, space, and acceptable flying weather. In my experience, Growler flights over my house on south San Juan Island are occasional, which suggests to me that they do not stick to specific flight paths. Any new flight paths should be identified specifically so that their effects on people, wildlife, and tourism can be accurately assessed. My husband and I are talking about moving because of the threatened increase in Growlers; if we're going to have an increase in overflights, we should definitely sell our house. The DEIS gives no hint about whether there will be additional overflights because it does not identify new flight paths or even (that I could find) show where the existing flight paths are.

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Sincerely,



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 [checked] 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

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:

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)
Whidbey Island resident

3. Address Clinton, WA 98236

4. Email _____

- 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

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. *concerned*
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area. *concerned*
- 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. *concerned*
- A decrease in private property values due to noise. *concerned*

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

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. *extremely concerned*
- 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:

① Increasing the number of growler flights is irresponsible when the current number is already damaging local groundwater supplies (8 wells over EPA limit for PFOAs from fire-fighting foam used at OLF and Ault Field). Mitigation of past damage and a plan to prevent this from worsening water quality MUST be addressed before any expansion moves forward.

② I am concerned for the quality of life for everyone across Whidbey Island. Many of us live here for the beauty of this open agricultural area rich in local

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. (over)

For more information, see, Coupeville Community Allies, 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.

food choices. Current flight numbers are already challenging and dangerous for the occupational health and safety of our local farmers on central whidbey. If the water supply is compromised and farmers cannot safely work in the out-of-doors, an agricultural way of life cannot be sustained here. Given that local foods and an agricultural lifestyle are core values of many residents, (myself included!) this is an unacceptable potential loss that must be fully considered in any EIS and future plans for naval activity at OLF, and on whidbey Island.

③ More personally, my housemate who works at a local farm in Coupeville, stands to lose her job if the OLF expansion forces the closure of the farm. The loss of this stable income, in turn, threatens our ability to pay rent, and ultimately our housing situation all the way down here in Clinton. We cannot be the only ones in this situation. Ripple effects from the proposed expansion will be felt up and down all of whidbey Island. Please consider the effects on all of us in any EIS, + just residents affected directly under the flight pat

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 [Redacted]
2. Last Name [Redacted]
3. Organization/Affiliation [Redacted]
4. City, State, ZIP Lopez WA 98261
5. E-mail [Redacted]
6. Please check here [X] 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

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:

Please consider seriously the 12 points listed above. There has got to be a solution here, that doesn't ruin the lives of the people that have to live with all of this noise.

Thank you,

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 Citizen

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
- 1.d. General Project Concerns
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 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.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see 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:
Please listen to your constituents. There is a
serious problem here. People in the San
Juan are being impacted greatly by

(Continue on the back)

your activities. There must be a solution
here!!

Seattle, WA 98122

1. Please include a 60 day comment period after the final EIS is completed. This is an important opportunity for citizens to reply to the final EIS. 2. The Coupeville Middle and High School are not included in the DEIS for noise measurements or impact (DEISp. 4-35). These schools are located closer to the flight pattern than the Coupeville Elementary School. The final EIS needs to address the potential impact on CMS and CHS. (This is on my student impacts sheet). 3. The DEIS uses an outdated noise simulation model that a DoD commissioned study found is not appropriate for Growler engines. Noise study needs to include actual sound measurements with appropriate sound measurement equipment. Individual measurements made by the National Park Service show noise levels far in excess of that predicted by average modeling. 4. Water contamination to sole-source aquifer is not adequately addressed in the DEIS. 5. Alternatives to using the Coupeville OLF were not adequately considered. 6. Jet noise reduction options are not thoroughly considered. 7. Crash frequency and impacts are not addressed. 8. Economic impacts on tourism, property value loss, decline of population, and loss of businesses is not addressed adequately. 9. Impacts to natural resources and recreation are not addressed, including bird migration and animal habitat, Ebey's Landing National Historic Reserve, as well as all aspects of outdoor recreation. 10. Frequency and effects of fuel dumping not addressed. 11: There is no attention in the DEIS to the impact of jet noise on children's learning. Considerable research has been done in this area (Cohen, Evans, Haines) with over 20 studies indicating that jet noise adversely impacts children's academic performance. (Jones, 2010) In very recent research, the NORAH study (Klatte et al, 2016), which examined the impact of jet noise on students in schools with exposure levels below 60 dB and thus considerably lower than in previous studies, multilevel analyses revealed that increasing exposure was clearly and consistently associated with decreasing reading performance and less positive ratings of quality of life by children. The DEIS states: No school would experience an increase of more than two learning-disrupting events per hour under any scenario under Alternative 1 compared to the No Action Alternative. Oak Harbor High School (S01) and Crescent Harbor Elementary School (S02) under Scenarios B and C (with windows open) and Coupeville Elementary (S03) under Scenario A (with windows closed) show the highest increase of classroom/learning interference, at an additional two events per hour. (DEIS p.4-69) Comment: Given the strong and consistent evidence on the impact of jet noise on students' academic performance, what is the Navy's proposal for how to mitigate this impact on Coupeville's children? Given these potential impacts on Coupeville students, the Navy needs to reexamine the No Action Alternative and explore other options for operations to be performed at other locations. 12: Omission of Coupeville Middle and High Schools from DEIS. There is no mention of either the Coupeville Middle or High School in the Draft EIS (p. 4-35). These schools are located closer to the flight pattern than the elementary school. Comment: The final EIS needs to address the potential impact on CMS and CHS. 13: There is an assumption in the DEIS that all learning takes place indoors. The School Garden Program is expanding, with all elementary students engaged in garden based learning and plans to develop the middle and high school gardens and curriculum over the next year. Athletics and elementary recess take place outdoors year round. The DEIS states: Because the individual is assumed to be indoors

1.a. Thank You
 10.a. Biological Resources Study Area
 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
 2.e. Public Involvement Process
 2.h. Next Steps
 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.l. Points of Interest
 4.o. Classroom Learning Interference
 4.q. Potential Hearing Loss
 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.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
 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

for this analysis, noise level reduction factors were applied because the walls, doors, insulation, and other building features reduce the noise levels inside. (DEIS, pp.4-37, 4-66) The data show that there is a range of potential outdoor speech interference that may disturb individuals participating in outdoor recreational activities depending on the location of the POI relative to the airfields and flight tracks. The average number of events is mostly consistent with those expected under the No Action Alternative conditions; however, some POIs may experience an increase in the average daily events. These increases range from zero to an increase of three events per hour (P03), depending on the scenario. (DEIS p. 4-44). Comment: The final EIS must include analysis of the impact on students engaged in outdoor based learning. How could this potential increase impact student learning? There is evidence that children are more sensitive to noise and health impacts from jet noise than adults; the attention to this in the DEIS is also inadequate. 14: Contradictions in the DEIS about health and hearing impacts. There is an overall minimization of health impacts in this draft document, yet the DEIS states, in reference to Alternative 1: "In addition, depending on the scenario, the population potentially at risk for potential hearing loss would increase." (p.4-50) Comment: The final EIS must include a thorough examination of the multitude of studies that address and verify the health impacts of noise on children in addition to Noise Induced Hearing Loss (NIHL) such as sleep deprivation, stress and its' impact on increased cortisol levels and gastrointestinal functioning. (Goines and Hagler, Franssen et al, Pietrangelo) 15. Impacts upon the history and culture of Whidbey Island residents have not been adequately considered. In particular impacts upon the current and ongoing sustainability and functionality of Ebey's Landing National Historic Reserve participants, residents, and surrounding community members have not been adequately addressed. Sources: Cohen, Evans, et al, "Physiological, Motivational and Cognitive Effects of Aircraft Noise on Children", American Psychologist, March 1980 Evans, Bullinger, Hygge, "Chronic Noise Exposure and Physiological Response: A Prospective Study of Children Living under Environmental Stress" American Psychological Society, January 1998 Evans, "Child Development and the Physical Environment", Annual Review of Psychology, 2006 Klatt, Spilski, "Effects of Aircraft Noise on Reading and Quality of Life in Primary School Children in Germany: Results from the NORAH Study", Environment and Behavior, Sage, November 2016 Hygge, Evans, Bullinger "Prospective Study on Some Effects of Aircraft Noise on Cognitive Performance in Schoolchildren" American Psychological Society, September 2002 WHO Training Package for the Health Sector, "Children and Noise, Children's Health and the Environment" 2010

Coupeville, WA 98239

I do not believe the EIS for EA-18G Growler Airfield Operations at NAS Whidbey Island had adequately addressed a number of issues important to the community. I don't believe the noise measurements made by the Navy are accurate and they do not reflect actual (higher) noise levels that many of us are living with. I'm very concerned that water contamination of local wells is not addressed. The EIS does not adequately address the impact of the proposed extremely high new levels of operations on children, the island's natural resources, or the economic effect on tourism or property values. I understand that the Navy will continue to carry out these operations and even may need to increase them, but the EIS is entirely weighted in favor of the Navy and does not take into consideration the extent of such significantly increased numbers of operations on everyone else. I would hope that more reasonable middle ground can be reached that protects the community better.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.f. Noise Measurements/Modeling/On-Site Validation

Clinton, WA 98236

I am writing to express my concern about the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island. My concerns are: - Water contamination to sole-source aquifer is not adequately addressed in the DEIS. - Actual noise measurements were not made. Noise modeling is outdated & noise averaging is inappropriate. Individual measurements made by the National Park Service show noise levels far in excess of that predicted by average modeling. - Alternatives to using the Coupeville OLF were not adequately addressed. - Jet noise reduction options are not thoroughly considered. - Crash frequency and impacts are not addressed. - 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. - Economic impact on tourism, property value loss, decline of population, & loss of businesses is not addressed adequately. - 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. - Frequency and effects of fuel dumping not addressed. As a resident of Whidbey Island, I am very concerned about these issues and believe that the EIS does not adequately address the impacts of the proposed changes on our community.

- 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

Seattle, WA 98122

Four generations of my family have lived, worked, and raised children in Coupeville, with business and homes located in the Growler flight pattern. I attended Coupeville Elementary, Middle, and High schools. There is no mention of either the Coupeville Middle or High School in the Draft EIS (p. 4-35). These schools are located closer to the flight pattern than the elementary school. The final EIS needs to address the potential impact on CMS and CHS. Given the strong and consistent evidence on the impact of jet noise on students' academic performance, what is the Navy's proposal for how to mitigate this impact on Coupeville's children? Given these potential impacts on Coupeville students, the Navy needs to reexamine the No Action Alternative and explore other options for operations to be performed at other locations. Additionally, the final EIS must include a thorough examination of the multitude of studies that address and verify the health impacts of noise on children in addition to Noise Induced Hearing Loss (NIHL) such as sleep deprivation, stress and its' impact on increased cortisol levels and gastrointestinal functioning. The children of Coupeville deserve to have these considerations taken into account as their health, education, and futures will be impacted.

- 1.a. Thank You
- 2.I. No Action Alternative
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests

1.a. Thank You

COUPEVILLE, WA 98239

As a retired Air Force Officer who has spent most of my life around AND under jet flight paths, I support and defend the EIS. My father worked at North Island after serving in WWII as a aircraft QC Inspector. We lived under NASNI flight path. We heard sonic booms regularly with no harm. I worked and lived at flight lines near B-52s, F-4s, KC-141s-, SR-71s, F-18s, V-22s, KC-135s plus everyother plane and help that used NI or Imperial Beach OLF. Between 2001 and 2014 I worked at Qualcomm on Mira Mesa in San Diego, CA under the Miramar flight path were we regularly had to pause our discussions / phone calls because of F-18s. I NEVER remember the same vile complaints. No one ever was concerned about their hearing. It was not an occasional few flights a month but a number of flights every day. There are millions/billions of acres these complainers can go and only a few that our military require. I enjoy the sound of freedom and am proud to be in the area where the Growlers fly.

Seattle, WA 98125

Hello: I am writing to object to the addition of any more Growlers to the Whidbey Island Air Station. The Growlers level of noise pollution creates numerous health concerns for people living on the Island as well as on the Peninsula where the planes fly. It is deeply troubling that these planes fly over numerous Native American Reservations disturbing their lifestyle, health and values without their having been appropriate consultation to the tribes. The flights also threaten the home owners with their properties becoming unsellable and worthless. It also threatens already stressed animals like birds and insects. The siting of the planes cannot be separated from where they will fly and the impacts those will have on the people and animals in their flight path. I realize you consider the training missions to have already been a decided issue by posting a sign out in the rainforest - I do not feel that was adequate notification to affected populations. But even if a settled matter the adding of additional planes will further exasperate the problems which local communities are upset about. But the issue I find most acceptable is the HUGE use of fuel and thus carbon pollution by these planes at a time we as a planet must do everything we can to reduce carbon. 1304 gallons of gas per plane per hour, and 12.5 metric tons of Co2 an hour is crazy! That is 23% more than the Co2 emission of one WA resident for a whole year - used in just an hour. This is completely unacceptable. Sincerely, [REDACTED]

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.l. Bird Migration
- 12.j. Property Values
- 18.b. Average Carbon Dioxide per Aircraft
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 9.a. Consideration of Tribes

1.a. Thank You

Port Townsend, WA 98368

Please fly as low and loud over Port Townsend WA as you can - it is one of my favorite sounds and reminds us that we all live in freedom without fear because of the men and women who serve. GO NAVY!!! FLY WHEREVER YOU DANGED WANT TO!!! WHOOOHOOOO!!!! RAH!

CLINTON, WA 98236

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.

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

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

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.

Anacortes, WA 98221

The introduction of the EA-18G to the airspace above the island on which I live has had a devastating effect upon my life. I have recurring nightmares about planes hanging over me, writhing, shrieking. Every time I look out a window, or am outside, or in a car, I find myself involuntarily searching the sky for signs of their oncoming presence, with premonitions of the agony that will follow in their wake. I find myself constantly listening for the onset of their approach. Lesser sounds that remind me of it now provoke panic. You have made me filled with dread when I go for walks in the woods on Fidalgo Island, because I know that at any second you may commence an assault upon my position. I visit the forest not only to sea trees and the sea, but also to hear them. When you fly, there is only you. I am hardly able to maintain a grip on my surroundings at all. It is unforgivable to convert forests into engine turbines. I awake in the morning terrified that you will begin booming overhead while I struggle to fall asleep again. I have been woken up more days than I can count. I have been exhausted perpetually. I have struggled with chronic insomnia since 2010, when you began your work in earnest. I have lost the ability to fully concentrate on anything, or to forget myself in any activity. I am always waiting for the Growlers to come back. They always do. They will continue to do so until I am dead. I do not have the financial means to "simply move," as your horrifying civilian cheerleaders seem to think anyone can do at any time. I can't work when I am scared of the planes all the time. I have moved in with my mother, and I am waiting to die. I have spent whatever pittance I have ever saved on hearing protection. Nothing is adequate to the worst of your activities. The only way out I see is to kill myself. I will do so before the end of the year if your activities expand exponentially, as you have promised. This is not a threat (however impotent), it is the only means I have to deliver myself from the agony you are putting me through. You haven't the slightest sympathy for the pain you have caused. You content yourself with the knowledge that only a minority are so intensely adversely affected, and that only a subset of that group will summon the nerve to voice their pain to a community which goes out of their way to let them know they couldn't care less. You have destroyed whatever positive feelings I have ever had for this country. Every time an EA-18G makes me cower, screaming into my pillow, or reduces me to shaking in the forest while I clutch at my head, I am reminded of what a hellhole this place is, what horrible people run roughshod over me. I have spent days outside at Washington Park where the booming never stops. It just keeps coming, wave after wave after wave, punctuated by screaming flyovers directly over my position. Every time I step outside I fear I am risking permanent hearing loss. If the fear keeps me indoors it makes no difference; you route the jets right over my roof as well. You do it after midnight. You do it before dawn. You do it any time you feel like it. I have always been a loner who wanted a quiet life, with free-time spent outdoors with books. You have stolen that from me. The north Puget Sound is now a war zone, a permanent playground only for war machines, those employed in their usage, and those who don't mind being deafened, who demonstrate their hate for anyone who dares to make any complaint. I feared being shouted at or marked for reprisal by such people if I showed up at one of your public comment meetings. Fear of reprisal has also prevented me from making complaints directly to the Whidbey air station. This whole draft EIS is absurd: a thousand pages whose only message is that you will do whatever you please. You don't care who gets hurt—as long as those hurt are powerless to stop you.

- 1.a. Thank You
- 1.d. General Project Concerns
- 12.n. Quality of Life
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation

You pretend I don't exist, that I don't matter, that my pain is unreal. You allege that the panic and fear, the daily, violent acid reflux and tinnitus I have lived with for more than six years now are phantasms, or brought on by something other than this catastrophic influx of perpetual warfare into my life. You've destroyed my life. My health is gone. The stress is killing me. You won't stop. You've only promised to make it even worse. I would beg, or scream and cry, but I know you don't care in the slightest. You are monstrous. At the very least, I would beg you to stop using Fidalgo Island as a place for Growlers to fly in pairs at low altitude and at high speed. It is this hugging-the-terrain exercise that has caused me the most trauma. If this were to stop, I could at least face the idea of going on living in your horrific presence. It is one thing to hear jets flying overhead in a nightmarish highway system, from distant point A to distant point B. It is quite another to have them strafe overhead with a boom that I feel in my intestines, that makes my feet shake, the roar of which doesn't disappear before the next pair booms overhead. You have the gall to talk about a cool-down period being necessary to reduce the stress and risk of hearing loss in those below, in the full knowledge that many of your training activities provide no such respite. I read in a comment online once by one of your gloating fans that "the pilots are laughing at you"--i.e., at all those who make noise complaints while they scream overhead. If any of this agony is a matter of pilot discretion rather than mission profile, than one certainly has experienced no mercy from those individuals either. You all seem to delight in inflicting the maximum amount of pain. I suppose this letter will give you pleasure, then. I have been trapped by birth and poverty into a nightmare that I cannot wake up from. I have you to thank for underlining this for me. Each day you burn away more of whatever it was that ever made life okay, pleasant, or something other than an unrelenting agony. Even when you are not flying, the memory of the worst you have done to me never leaves. You like to say repeatedly that your activities have no significant effects, but I know what I have lived with, the hell my body and its surroundings have become. You've taken everything. I may hate being an American, and hate other Americans, but it is you who have reduced me to this. You harp on about national security. But one aspect of that is ensuring that even hypersensitive introverts like me have a place to live, sleep, think, without constant fear, pounding heart, and longing for death. The only gifts I received at birth were sharp senses and an aptitude for reading and learning. You've stolen the only things that ever mattered to me, from me. All you do is continue to fight a cold war that matters to nobody but racists and spend billions on sabers you rattle at ever increasing volume. You have taken something beautiful and reduced it to a cacophonous hellhole. You have made my life a prison sentence. All you do is rattle my cage and gloat while I cower in the dark. No citizen should be classified as collateral damage, or as an acceptable loss. This EIS document demonstrates how easily you write me off as worthless.

Coupeville, WA 98239

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

I am fully in support of NAS Whidbey and request scenario A (80-20 split of field carrier landing practices between OLF Coupeville and Ault field. I also request coexistence and healing between OLF AND Ebeys National Historic Reserve. Respectfully, [REDACTED]

Anacortes, WA 98221

- 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).

Anacortes , WA 98221

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

Anacortes, WA 98221

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.

Anacortes, WA 98221

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. As an anacortes resident I am experiencing exceptionally on either of those flight paths, with increased sorties this problems is unacceptable.

1.a. Thank You

3.b. Flight Tracks and Federal Aviation Administration Regulations

4.a. General Noise Modeling

Langley, WA 98260

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, I am in no way "anti Navy," and would support the Growlers being tested in an area of the country where the environmental, socio-economic and human impacts are not so severe. We know that such places exist. Unfortunately, central Whidbey is uniquely unsuited to being subjected to such impacts and the Draft EIS is not at all thorough in considering them. Below are some of the areas that need further consideration and evaluation: 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) 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,

- 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.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

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. 28. The draft EIS analysis is deficient in numerous areas. CEQ regulation 1502.9 (a) states that "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." The EIS should be supplemented to address deficiencies identified in comments and offer further opportunity for public comment before the final EIS is prepared. Thank you for considering these comments. Sincerely,

██████████

Port Townsend, WA 98368

I live in Port Townsend. I walk in the Olympic National Forest. I object to the lack of consideration of my experience of growler noise in these areas. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated. According to the Navy, the [Growler] Draft Environmental Impact Statement (DEIS) "...evaluates the potential direct, indirect, and cumulative environmental impacts of the Proposed Action under three action alternatives." However, not all direct, indirect and cumulative impacts are being examined in this EIS; for example, jet noise is directly impacting communities, Tribes and wildlands well outside the immediate environs of Naval Air Station Whidbey Island (NASWI); 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 OLF Coupeville, 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. By failing to enlarge the scope of its analysis beyond NASWI, the DEIS also violates NEPA by failing to consider the interdependent parts of a larger 2 action, that cannot proceed without takeoffs and landings. By failing to consider these automatically triggered additional impacts resulting from activities beyond the runways that cannot be conducted without takeoffs and landings, the DEIS also fails to evaluate cumulative effects. By failing to initiate consultation under Section 7 of the Endangered Species Act with the US Fish and Wildlife Service on potential impacts from the 47 percent increase in flights to 130,000 per year, including 79,000 Growler flights, the DEIS fails to evaluate direct, indirect and cumulative impacts on threatened and endangered species.

1.a. Thank You

10.c. Wildlife Sensory Disturbance and Habituation

10.f. Endangered Species Impact Analysis Adequacy

4.e. Day-Night Average Sound Level Contours and Noise

4.i. Points of Interest

Sequim, WA 98382

1.a. Thank You
2.I. No Action Alternative

We need to maintain the serenity and beauty of God's natural gifts to us. More weapons, more war, more destruction of natural spaces will eventually lead us to self immolation. No growlers over the Olympic Peninsula.

Victoria, British Columbia V8S 2N4

Thank you for the opportunity to comment on your plans to increase significantly your Growler fleet and add many more flights based on Whidbey Island. We live in the Oak Bay municipality in Victoria, British Columbia, and as Canadians we know we can't really expect to influence your plans for additional Growler activity. You cannot be unaware, however, that the excessive noise produced by your ongoing activities does have a distressing influence on the quality of our lives here. While we understand your need to train your pilots in the use of these complex planes, you must appreciate how they create an overload of enormous rumbling noise and disturbing vibrations within our homes, including sleep-disturbance. The prospect of your adding to this already excessive noise is distressing to us. We hope that you are also taking into account the effect this noise pollution is already having on our vulnerable resident whale population, as well as on other wildlife, in our otherwise serene Salish Sea. We trust that you are open to adopting a good neighbour policy and will consider every means possible to minimize the highly stressful effect your planes are having on what otherwise are our quiet and peaceful communities in Canada, as well as on your own in the U.S. neighbours, and reconsider plans that are certain to produce yet more noise and atmospheric pollution. We appreciate your consideration of our concerns. [REDACTED]

1.a. Thank You
10.m. Impacts to Marine Species and Habitat
12.n. Quality of Life
4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
4.l. Points of Interest
4.p. Sleep Disturbance
4.t. Noise Mitigation
6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

Port Townsend, WA 98368

I have two major concerns about this EIS. The first is that it reflects just one aspect of the expansion of Growler activity in this area. The electronic warfare training program has been run through separately. It's difficult not to feel that this is a deliberate attempt to minimize what will actually be a larger impact on the surrounding residents. The structure of the information sessions that have been held on this EIS, with no option for public discussion, reinforces the suspicion that we're not seeing the full picture here. The second is with the increase in noise levels. The noise analysis in the EIS focuses on hearing loss and speech interference. There's a body of existing research on the impact of noise on health and on learning/cognitive development that I don't see accurately addressed here (beyond dismissing it as not an issue). I know that it's your policy to cut back on Growler flights during academic testing periods, so you are aware that it's a problem. This isn't adequately addressed by the EIS. In addition, the document talks about an increase in average noise levels. The levels stated don't come close to matching my experience with the existing noise levels. Yes, they're not high on average, but the peak levels can be quite disruptive even quite a few miles from the OLF. The models that you are using don't capture this. They don't appear to be even trying to capture this significant impact on residents.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests

Bellingham, WA 98226

Due to the distractions and demands of this season, I request an extension of 45 more days on your decision to permit the Navy to use Forest Service roads for the mobile electromagnetic radiation emitters.

- 1.a. Thank You
- 19.d. Electronic Warfare
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

1.a. Thank You

Clear Lake, WA 98235

I own a company in Clear Lake and we have employees who live in Oak Harbor, Coupeville, Anacortes, Burlington, Mount Vernon, Sedro Woolley and Bellingham. Our company has done contracting work at NAS Whidbey over the years. Without exception, we support the Navy and the flight operations it conducts. We appreciate the steps the Navy is taking to mitigate noise impact on residents. Ultimately, we acknowledge that in order to perform the vital role in protecting our country, the Navy may impact residents. Go Navy.

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 TRANSITION LOPEZ ISLAND

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

**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

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:

1.a. Thank You

Coupeville , WA 98239

As an affected property owner I am strongly opposed to the dramatic increase in the use of the Coupeville OLF

1.a. Thank You

Cincinnati, OH 45244

Eisenhower Alert! Eisenhower Alert! Eisenhower Alert! My thoughts are as follows: If this were to happen - We might as well throw in the flag. We will have been destroyed from within our own borders. We will have been destroyed from within our own borders. We cannot say we are Protecting our wellbeing by destroying our well being. We cannot say we are Protecting our wellbeing by destroying our well being. We cannot claim balance if we go out of balance. We Will become more of a target for nimrods who seek this sort of thing - which is not the desired effect of balance. (As was the warning when I addressed the Navy when someone wanted to put a radioactive floating tower in the sound but then decided to put it in Alaska) Of course you don't want to put this kind of super disruptive thing in what's left of the USA's rare Marine and inland island existing environment. It will naturally rally and draw up a ruckus of patriotic citizens who will act as alarm bells whenever we activate the "Eisenhower Alert"... And it is going off - ringing, lights flashing ---- It is out of balance to spend excess taxpayer energies on creating - imbalance. "Beware the Military Industrial Complex" (Dwight D. Eisenhower - President WWII) Thank you for sending me - one who has been to NAS Whidbey and is the daughter of a proud Air Force vet - the notice in the mail asking for my input.

Coupeville, WA 98239

1.a. Thank You

3.i. Runway Operating Hours and Flight Schedules

WhidbeyHealth is dedicated to delivering quality health care services to the residents and visitors on Whidbey Island. As the main health care provider on Whidbey Island, WhidbeyHealth has a strong interest in maintaining a healthy environment for our patients to receive health care and recover from injury or illness. As high noise levels have the potential to negatively impact patient satisfaction and patient care, we ask that the Navy uphold its commitment to avoid flying over airspace above or in close proximity to the Medical Center, as they have committed to in the past.

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

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.

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

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

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.

c, 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.

Mount Vernon, WA 98273

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, the 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." 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.

Port Angeles, WA 98362

"While I am in support of training our military pilots properly I think flying supersonic Growler war planes over and within hearing range of Olympic National Park and its adjacent federal wilderness and national and state forestlands buffer zones as well as over and within hearing range of the San Juan Islands National Monument is really destroying the irreplaceable natural soundscapes of these important public wild land reserves. We know from numerous scientific studies (<http://www.truth-out.org/news/item/28009-documents-show-navy-s-electromagnetic-warfare-training-would-harm-humans-and-wildlife>) that the Growlers are loud enough to directly disturb and disrupt wildlife populations feeding and breeding in these limited safe protected habitats which is totally unacceptable since these are absolutely the last wildlife refuges with sufficiently large intact ecosystems to sustain many native wildlife species. Unfortunately the jets are also so loud as to significantly diminish the quality of life for us at our home in SE Port Angeles. Also there is real concern that the electromagnetic radiation from Growlers and training vehicles on the ground is harmful to both human and wildlife health (<http://onlinelibrary.wiley.com/doi/10.1111/jcmm.12088/full>). As fourth generation residents of Washington State our family chooses to live and work here specifically for the close proximity to the peaceful natural outdoors environment and we very highly value the enduring presence of large area functionally self-sustaining natural parks and preserves undisturbed by human activity such as the million acre Olympic National Park. In our opinion the Growlers represent a 'final straw' level of negative human impact to Western Washington's already heavily damaged natural environment that would force us to join and supporting the growing strong legal and activist challenge to the Navy's plans for increased air land and sea exercises and training for this region. Frankly I think while at one time several decades ago Whidbey Island Naval Air Station was a good fit for NW Washington it is really no longer a good location for this kind of very damaging high impact noise given Western Washington's now densely settled population of 5.3 million people (211 people per square mile) with only a few very sensitive and therefore critical remaining large natural parks, forests and wilderness preserve lands that function as critical refuges for our last remaining wildlife populations. Maybe these Growler planes could fly over the much less populated and less biologically diverse more extensive desert lands of Eastern Washington which has only 1.5 Million people in an area twice as large as Western Washington and redevelop the huge Moses Lake airport for a Growler airbase or share Joint Base Lewis McChord as an airbase? Or maybe just fly the Growlers east over the Interstate-5 corridor between Olympia and Mount Vernon which is already heavily developed and so very noisy. Wouldn't flying over a more densely populated urban zone developed area be more technically challenging real world training environment to detect and jam simulated enemy electronics and radio signals there anyway? Thank you for the opportunity to comment and thank you for your service.

- 1.a. Thank You
- 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
- 7.d. Recreation and Wilderness Analysis and Study Area

1.a. Thank You

Oak Harbor, WA 98277

I have lived in the flight pattern for 38 years and have no hearing problems. I had to sign papers when I purchased our house saying I was aware we were in the flight pattern. The base was here before the houses were built. In which case you have no business complaining.

Coupeville, WA 98239

I am against the possibility of increasing Growler flights over central Whidbey involving OLF for the following reasons: --flights and noise may increase fourfold; --the OLF is 2000 feet too short and needs to be lengthened; --Accident Potential Zones need to be implemented, and federal funding should be procured to move residences, churches, youth facilities school, restaurants etc,out of the accident zones.

- 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

1.a. Thank You

Victoria , British Columbia V8N 6L3

We find that there is a significant amount of disruptive noise and vibration felt by the growler aircrafts on a frequent basis.

Date: Feb 8, 2017
 TO: NAVAL FACILITIES ENG. COMMAND (NAVFAC)
 ATLANTIC, ATTN: CODE E121/SS
 From: [REDACTED] AIRPORT VIA 98221

1.a. Thank You
 14.a. Transportation Impacts
 3.a. Aircraft Operations
 3.i. Runway Operating Hours and Flight Schedules

1. I OWN RESIDENTIAL PROPERTY ON FIDALGO ISLAND AND RENTAL PROPERTY ON NORTH WHIDBEY ISLAND.
2. THE STORY THAT WE HEARD WAS THAT THE OLD JETS WERE GOING TO BE REPLACED BY THE GROWLERS BECAUSE THEY WERE CONSIDERABLY QUIETER..
3. MY RENTAL PROPERTY IS WITHIN THE FLIGHT PATH ON NORTH WHIDBEY. THE NOISE LEVEL HAS INCREASED CONSIDERABLY WHILE THE TAXES INCREASED RAPIDLY.
4. ON SOUTH FIDALGO ISLAND, THE NOISE OF WARMING ENGINES FROM THE BASE IS HEARD AT ODD AND UNEXPECTED HOURS. IN ADDITION, THE JETS FREQUENTLY FLY OUTSIDE THE FLIGHT PATH AT LOW ELEVATIONS AND RISKY MANEUVERS IN THE MIDDLE OF THE NIGHT. IT IS HIGH NOISE LEVEL.
5. THE VEHICLE TRAFFIC, TO AND FROM THE BASE, HAS INCREASED TENFOLD IN THE LAST FIVE YEARS. THE DRIVERS ARE AGGRESSIVE AND CARELESS. THIS MAGNITUDE OF TRAFFIC IS IN THE PROCESS OF DESTROYING THE RURAL CHARACTER OF SOUTH FIDALGO ISLAND FROM SHARPE'S CORNER TO THE DECEPTION PASS BRIDGE.
6. PLEASE CONSIDER THESE CONCERNS AND ENVIRONMENTAL DEGRADATIONS INTO YOUR EIS FOR EA-18G GROWLER AIRFIELD.



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 resident
- 3. Address [REDACTED] Clinton 98236
- 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 about the levels of fuel (burned) that enters the air and sooty waters.

I am concerned about the impacts of noise on our citizens especially children, pregnant mothers and animals - domestic and agricultural.

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.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)



Public Meeting Comment Form

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1. Name [REDACTED]
2. Organization/Affiliation Coupeville High School
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 work at the high school in Coupeville, WA. We are not in the direct flight path, but are definitely impacted by jet noise. Even when we are not in direct flight path, jets go overhead. When that occurs, classroom instruction must stop; ^{normal classroom conversation is not possible.} That is unacceptable. Furthermore, the largest local concentration of where students' families are housed is Admiral's cove, directly under the flight path. Jets run for hours ~~at~~ at a time on school nights, often until after midnight. This is highly detrimental to my students' sleep quality and subsequent academic. The proposals for increased jet activity put our school (and the hospital) into zones

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

YOUR INPUT MATTERS

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 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.

that have DNL of well over the "65 DNL" threshold for
"annoyance." Is it reasonable to expect ^{that an acceptable} ~~that an acceptable~~
~~environment~~ 75 DNL is appropriate for a learning
environment?

For more information, please visit the project website at whidbeyis.com

Please print
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YOUR INPUT MATTERS



Public Meeting Comment Form

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1. Name [REDACTED]
2. Organization/Affiliation Coupenille Resident
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 a home that is not directly in the flight path, according to the map that was provided me upon the purchase of my home. Now, however, the flight path has edged southeast and flights now come much nearer to our house. We cannot be in the yard during flights because it causes physical pain. This was never once the case before Growlers came (when Prowlers were flying). So...

① The claims that Growlers are not louder may be true technically, but the noise realized on the ground is definitely greater than with Prowlers.

② The claims that "I knew what I was getting into when I purchased my house" is also then false.

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
- 4.d. Day-Night Average Sound Level Metric
- 4.k. Comparison of the Prowler to the Growler
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.c. Noise Disclosure

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.

The suggested DNL levels ~~is~~ (listed in Scenarios) are far above those acceptable by even Navy Standards. On a US Fleet Forces Command website, it is stated that "Greater than 75 dB DNL noise zone is the most noise-impacted area and requires the greatest degree of land use control." The scenarios outline DNL levels at 75 or greater near/around many housing developments (around OLF in Coupenlle). That is unacceptable.

The FICUN considers "all noise exposure above 75 DNL to be incompatible" with all residential uses except transient lodging - with noise level reduction measures of at least 35dB.

Will the Navy provide mediation for this? NLR to local residents.

For more information, please visit the project website at whidbeyis.com

Please print

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

YOUR INPUT MATTERS

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)
Coupeville High School Teacher

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:

As a teacher at Coupeville High School, I'm extremely concerned about how the increased flights proposed will impact all 3 of our district's schools. #1) the proposed number of flights will necessitate daytime flights, which will directly affect the learning environment. I'd like the Navy, in the final EIS to address, specifically, the DNL impact on the school day. #2) Though there is a "conceptual" APZ map in the DEIS, surely it does not match what the actual APZ map would need to be, based on current flight patterns. I'd like the Navy to construct this "actual" map, which I fear the Coupeville Schools will likely land in.

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For more information, see, Coupeville Community Allies, 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.

Prepared by Coupeville Community Allies
January 18, 2017

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)
Coupeville Resident

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
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

- 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 concerned about the integrity of our very unique (only one of its kind in the nation) - Ebey's National Historic Preserve, which was designated in order to preserve the historic buildings and agricultural way of life that has been here for so many generations. Having jets flying overhead surely impacts visitors to this national treasure, but I'm wondering, in particular, about the impact on our historic buildings. I'd like for the Navy to address this in the final EIS. How does this level of vibration impact sensitive, aged ~~buildings?~~

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Camas, WA 98607

1.a. Thank You

2.n. Alternatives Considered But Eliminated

We often visit our daughter's family in Crocket Lake Estates just west of the landing strip in Coupeville. When the Navy is using that strip for practice maneuvers, the growlers fly so low we can see the pilot's face while sitting out on my daughter's deck so you can image the decibel level, I'm sure way over the safe limit. And add 36 more planes to the schedule??? Really? What about moving it to a less populated area?

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] Freeland, WA 98249
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.

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- 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
- 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:

Just this past week I received word from an organic farm with whom I, my family, and friends do considerable business that the proposed expansion puts their business in jeopardy. Part of this comes from the noise impact on their workers. But in addition there is concern that the dramatic increase in over flights with the resultant increase pollutants being added to the air, eventually being added to the soil, not to mention the occasional dumping of excess fuel.

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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] *Freeland, WA 98249*
4. Email [Redacted]

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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, *especially on the young + elderly*
- 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
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- 4.o. Classroom Learning Interference
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- 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.d. Recreation and Wilderness Analysis and Study Area
- 7.g. Ebey's Landing National Historical Reserve
- 7.i. Deception Pass State Park and Other State Parks
- 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:

A major economic factor on the Island is tourism, the main resource for that is the natural beauty — the quiet, the clean air, the natural vegetation, the pristine water, both the Sound + the lakes. The excessive noise, the air pollution, and addition of pollutants to the waters, all will detract from the very elements that draw people here. I've already read negative comments made on the State Parks website with regard to people having to cut their vacations short, leaving comments that they will never return and will spread the word as to how horrible their visit was. Much of the effective advertisement comes from word of

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

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] Freeland, WA 98249
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:

In my retirement, both my daughters, along with the immediate families, moved to the island. One family has already left. The other, which contains two public servants, an educator and a health worker, purchased a nice home and remodeled it at considerable expense. They live not one mile from OLF; already people surrounding them are thinking of moving. The lower property value spiral is beginning and will intensify with the NAS expansion.

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Freeland, WA 98249

1.a. Thank You

12.h. Tourism

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

I have visited both Deception Pass State Park and its website, where I find warnings about the Growler noise. On the website, I find a number of negative comments about the affect of Growler noise on peoples experiences causing them to leave what they had anticipated as a peaceful vacation. State Parks publicity state that this is one of the most visited parks in the entire system. In visiting the parks, I've seen notices posted on the entry stations, warning of the possible high noise levels. Conversations with park employees verify that people leaving, requesting refunds, during flyovers. Since tourist income is a significant element in diversifying our island economy, I'm very concerned. And, we know that word of mouth is one of the best sources of advertising; negative reports, especially on websites, are very detrimental to our local economy.

1.a. Thank You

12.i. Housing Access and Affordability

Freeland, WA 98249

I am part of the lay leadership team of LUMC, which houses a 'warming center' for the homeless. With the expansion proposed, the increase in population, both military personnel and civilian workers, is already putting pressure on the available housing, not only on the island, but also on surrounding counties. The South Whidbey Homeless Coalition, which operates the warming center, has already experienced former residents of Oak Harbor, having been priced out of their housing and looking for housing on the southend of the island. Unfortunately, with a developing housing shortage, landlords are raising their rents and forcing present residents out of their housing. With the proposed increase of 35-6 more Growlers with an additional 42 in the future. our present housing crisis will escalate to huge proportions. As I understand it, the Navy's ultimate goal is to insure the peace; creating social chaos does not insure the peace.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Freeland, WA 98249

I grew up in Anacortes, went away for college, and pursued a career in public education in other parts of the state. Early on I knew that I would eventually like to return to this area, so early in my career I purchased a lot on Whidbey with the thought that I would eventually return here. I was able to do that in 1984, finishing my last 8 years in the Coupeville schools. What attracted me was the relative quiet and the natural surroundings, water, open land, and the quiet. I'm not alone in that; I'm even aware that a considerable number of Navy retirees came back here for the same reasons. Now, the Navy is proposing a massive invasion of personnel and equipment which will change not only the island, but the Olympic Peninsula, in fact, the entire Salish Sea, for ever. Surely there's another way to do this without dramatically altering the beautiful, peaceful place.

Freeland, WA 98249

I'm concerned about the stationing of virtually the entire Growler force in one geographic place. Especially with the threat of North Korea on the horizon, having all the Growler's in one place make WINAS an easy target for just one nuclear warhead. Historically, military strategy has emphasized not concentrating your personnel and equipment in easy to destroy places.

- 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

Freeland, WA 98249

The noise modeling used in the DEIS is misleading. First and foremost, I know what I experience. Having lived on the island for 33 years, I've experienced being directly under the Prowlers. Recently, I've had the experience of being directly under the Growlers. The Growlers are significantly louder. It's the human experience that's important, not some mechanical recording that is averaged out in a complex mathematical way to allow a Navy lawyer to say in Federal court, "Your honor, the Growlers are not louder than the Prowlers." When I heard that said, I lost what respect I had for the Navy's integrity. Someone higher up put those words in that lawyer's mouth. And, from what I've read in a number of places the use of your models of sound is just as misleading.

1.a. Thank You

4.a. General Noise Modeling

4.k. Comparison of the Prowler to the Growler

Victoria, British Columbia V8V 4C9

I appreciate the EA-18G. I really do. And I have heard before that "...that noise? That's the sound of freedom!". But it really is a deep startlingly loud rumble at virtually all hours of the day/night, that makes the window glass move and your chest feel funny. And before you dismiss this comment, realize that I'm a Project Manager in IT - I really appreciate tech.

1.a. Thank You

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



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 PORT TOWNSEND RESIDENT

3. Address [REDACTED] 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

The fighter jets known as "GROWLERS" cause damage to wildlife, the environment in general, hearing capacity of humans, under their flight path and the noise is earsplitting at night when they roar over head. It is a crime against humanity to have any growler jets, instruments of death, flying over the Pacific Northwest. My tax dollars pay for these murder machines. **STOP THEM NOW.**

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
- 4.q. Potential Hearing Loss
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

laupahoehoe, HI 96764

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

laupahoehoe, HI 96764

DNL readings mean nothing. 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

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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").

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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

laupahoehoe, HI 96764

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

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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.

laupahoehoe, HI 96764

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

To Whom It May Concern: We are a fourth generation family born and raised in Central Whidbey. Our family history and sense of place have made this area a life choice to raise our family and be an active family who loves our community. Our family also has 4 family members who have proudly served the military in different branches of the service, one who is serving currently. Our concerns with the current EIS are: Living under the flight path and experiencing the impact of the noise levels makes living unbearable at the time of these flights. The impact on all ages for hearing and health reasons needs to be a top consideration. To be viable economically within this region, business owners need to be able to communicate with employees and work on their properties with minimal disruption. The current level of flights proposed would have an adverse effect on those business owners such as farmers, construction workers and tourism. Property value is extremely important to those that have invested their lives building their homes and living their American dream in our beautiful location in the heart of the Ebey's National Reserve. Please consider alternatives to flying in other locations that are a better fit for these flights and pilots. Also, please consider Alt C if the decision to use OLF continues. In the 1980's similar discussions occurred with the EA6B Prowlers, done with a spirit of compromise for all parties involved. We appreciate the opportunity to comment and sincerely ask that this same spirit of working together will result in a workable solution for this current situation with the F-18 Growlers at OLF. Thank you for your time and consideration of this matter.

- 1.a. Thank You
- 12.e. Agriculture Analysis
- 12.j. Property Values
- 2.h. Next Steps
- 2.m. Record of Decision/Preferred Alternative
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

victoria, British Columbia v8x 2b4

this growling noise is affecting my health, I can not sleep. it sometimes starts up at 3 in the morning. it sounds like a truck left running in my driveway, and vibrates the house. Can this operation not be moved to the dessert away from people. it was quiet at 6 this morning but has started up again about 7:30 , 25/11/2016.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.p. Sleep Disturbance
- 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,

Name: _____

Address: _____

Sequim, WA 98382

cc: Hon. Derek Kilmer, U.S. Congressman, 6th 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

Anacortes, WA 98221

PLEASE DO NOT add more Growlers to NAS Whidbey. We live on beautiful forested Islands and the increased NOISE impact would be horrible to live with. When I am hiking on Whidbey Is. and on parts of Fidalgo Is. , the existing carrier practice landings are horrible to bear. I can't hear my hiking partner speaking to me. I feel that it also must impact wildlife as well. It seems incredible to me that your EIS states that there would not be significant transportation impacts on our islands!! DOES the FEDERAL GOVERNMENT know, or realize that there is only ONE ROAD to NAS Whidbey???? That's right, ONE Two-lane road, which travels over an almost 100 year old bridge. Already Highway 20 is significantly crowded, please do not add more. Also, housing infrastructure will be impacted as there are not enough houses available as it is.

- 1.a. Thank You
- 12.i. Housing Access and Affordability
- 12.n. Quality of Life
- 14.a. Transportation Impacts
- 4.n. Speech Interference (Indoor and Outdoor)



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.**

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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

THE NOISE IS TERRIBLE, ESPECIALLY when trying to hike in the forest near Deception Bridge + Ft. EBY. OR LAMS GOLF course

THE TRAFFIC IS ALREADY BAD ON Deception Bridge, Highway 20 + Sharpes Corner yet this will add hundreds more cars, because there isn't enough housing in Oak Harbor.

ALTERNATIVE NO more jets

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.i. Housing Access and Affordability
- 14.a. Transportation Impacts
- 14.b. Vehicle Collisions and Safety
- 2.l. No Action Alternative
- 2.m. Record of Decision/Preferred Alternative
- 7.i. Deception Pass State Park and Other State Parks

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 _____

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

**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

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:

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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.

1.a. Thank You

7.e. Impacts to Recreation from Noise/Operations

Langley, WA 98260

Noise impact to local parks will nearly double.

1.a. Thank You

Langley, WA 98260

Commercial areas subject to noise impacts will increase by ten-fold. More agricultural and residential areas will be impacted by noise.

Langley, WA 98260

Property values and property rights will be impacted by establishment of Accident Potential Zones (APZs).

1.a. Thank You
12.j. Property Values
7.b. Land Use Compatibility and Air Installations Compatible Use Zones

Langley, WA 98260

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

In one of Coupeville's four wells, levels of PFOA, a toxic chemical found in firefighting foam (AFFF), tested between 59 ppt and 62 ppt (parts per trillion). At distribution, after water blending, it was between 25 and 38 ppt. However, current test results for 8 private wells range up to 400 ppt, which is 10% of the wells that have been tested to date. The EPA's lifetime advisory level is 70 ppt. What is the Navy's plan for responsibly cleaning this up?

Langley, WA 98260

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Water contamination to sole-source aquifer is not adequately addressed in the DEIS. (resubmitted with this added sentence above) In one of Coupeville's four wells, levels of PFOA, a toxic chemical found in firefighting foam (AFFF), tested between 59 ppt and 62 ppt (parts per trillion). At distribution, after water blending, it was between 25 and 38 ppt. However, current test results for 8 private wells range up to 400 ppt, which is 10% of the wells that have been tested to date. The EPA's lifetime advisory level is 70 ppt. What is the Navy's plan for responsibly cleaning this up?

Langley, WA 98260

- 1.a. Thank You
- 12.b. Invisible Costs
- 12.c. Socioeconomic Impacts

Negative impact on many aspects of local economy was not properly studied or adequately addressed in DEIS. The increase of flights and planes will add no economic value for our region or contribute positively to our tax base here. This study just released shows clearly that the Navy presence is a burden on the Island County economy and offers ways to mitigate that concern. Full report: <https://sustainableeconomycollaborative.files.wordpress.com/2017/02/invisible-costs-feb2017.pdf> Summary: <https://sustainable-economy-collaborative.com/report/>

Langley, WA 98260

To whom it concerns regarding EIS for EA-18G Growler Operation at NAS Whidbey Island and OLF Whidbey Island: Unfortunately, as much as I have participated in these official public comments for many years, I have never seen or heard actual changes made in Navy activities and policies because of them. I truly hope I missed something and am mistaken. My first comment is about RESPECT. It is a simple request that comments from local area citizens like us actually be respected by law, heeded and taken into account when Navy and government decision makers ACT on this EIS and proposal. The second comment is about NATIONAL SECURITY. I see a great national security risk at issue here with so much of our USA military equipment and personnel being focused in this region of the Puget Sound. This makes NAS Whidbey and our surrounding area a very effective enemy target is the majority (or all?) of our fleet of Growlers along with their pilots and crew (which are supposedly the MOST important of our USA defensive aircraft fleet), are concentrated in one small area? From a military strategy standpoint alone, it looks very dangerous. The third comment is about WATER. With Navy confirmation that our central Whidbey wells for drinking water have been contaminated directly from the flight operations and fire retardant sprays at the OLF; I am appalled that there would even be consideration to continue or increase operations there until and unless there is every proven guarantee that this poisoning of our own citizenry will be cleaned up entirely and never happen again due to any possible flight operations there. The fourth comment is about SOUND. We must have guarantee from the Navy that children's education will not be disrupted by the inability to communicate during classroom sessions or by the inability for children, teachers and parents of the Whidbey Island citizenry to rest and sleep in peace at night. If we are sabotaging the wellness and development of our own children, we are destroying our national security at its very source. These are the people who will grow to serve and love this beautiful country of ours. I understand there are reports of classroom and sleep disruption FAR beyond a few times per day, into the 10s and 100s of times per day/week. This is unacceptable and there must be proof that this type of major sonic impact on children will never happen with the proposal of increased flight operations stated in this EIS. Even if some citizens do enjoy the "sounds of freedom and power" from these jets, there have been many scientific studies that confirm health impacts on human beings and other creatures due to this type of sonic unrest so I'll leave that up to other comments. The fifth comment is about NEED. What is the proven ACTUAL NEED of increase of these Growlers and their operations at OLF and NAS Whidbey? I have not seen any evidence or reasoning about the actual purpose for adding so many more. If there is no proven need, then there is no reason to spend this huge amount of budget and risk so many citizen's lives and health with this building of force. The sixth comment is about SAFETY. Accidents happen, there is no doubt about that. It is only a matter of when and where. The more densely populated our region becomes, the more lives are at stake when one of these aircraft has an accident. The more lives are at stake when fuel is dumped or fire retardant is sprayed or excessive noise is incurred. The seventh comment is about HOMELESSNESS, SOCIO-ECONOMIC STRESS and UNREST, REAL ESTATE and TOURISM. We already have a alarming rate of homeless youth, families and elders on Whidbey Island. The amount of affordable and mid range housing is a constant issue. Our social service

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.l. Community Service Impacts
- 14.a. Transportation Impacts
- 2.a. Purpose and Need
- 2.h. Next Steps
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones

organizations are working overtime as it is to serve the needs of these at risk people. With the proposal of increased Growler operations, military personnel increase will expand south to take over the very limited amount of housing, crowd our public works, stress our mental and physical health care systems and clog our roadways, parks and trails beyond our capacity to create infrastructure to serve them. This will displace those who have lived here before and strain our local economy to a breaking point. This will also serve to further militarize our entire island, beyond the Oak Harbor area. Most people move to buy a home or visit/travel to Whidbey Island for the natural beauty and relatively quiet rural atmosphere. Tourism is one of our foundational economic supports on South and Central Whidbey Island. We need to maintain the nature based, peaceful, friendly quality of life as it has been in order to keep our tourist dollars coming in. Increase of Growlers is in direct opposition to maintaining or increasing tourism. There is no doubt that the NAS Whidbey will continue operations that protect and serve our nation and region. What I object to is this proposal for unnecessary buildup of Growlers with their crews and operations that have proven to be dangerous, here on Whidbey Island. If there is in fact a proven need for this type of expansion, in order to not adversely and significantly impact the life and safety of Whidbey Island and its citizens, the Navy MUST choose to expand these operations to happen elsewhere, where there is FAR less population density and environmental risk, and where the impact on our own USA citizens and environment will be minimal. Thank you for your actual attention to these citizen comments and your resulting actions and changes in accordance with respect for their truth and accuracy.

Langley, WA 98260

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.

Langley, WA 98260

- 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).

Langley, WA 98260

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.

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").

Langley, WA 98260

The DEIS fails to address issues of national security posed by placing majority of this essential military equipment of Navy Growlers and pilots in one area/region, making it vulnerable to attack. Study needs to include other training areas instead and in addition to Whidbey NAS and OLF.

- 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

- 1.a. Thank You
- 1.d. General Project Concerns
- 2.n. Alternatives Considered But Eliminated



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 _____

3. Address LANGLEY WASHINGTON 99260

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 second comment submission - other one was an email.

This is simply two suggestions for how to address the
~~previously mentioned~~ QUALITY OF DRINKING WATER
~~mentioned negative impacts on~~ A WATER SOUND, ECONOMY, EDUCATION,
REAL ESTATE VALUES, HOMELESSNESS, HOUSING CRISIS, SOCIAL UNREST, CITIZEN
SAFETY and NATIONAL SECURITY:

REPLACE THE CURRENT WHIDBEY NAS commander with
another one who can address these concerns for the best

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:

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.

Result of all.

MOVE The majority of GROWERS, GREEN AND RELATED
OPERATIONS TO CHINA LAKE base
area where the impact on densely populated
area will not be a factor.

Thank you.

For more information, please visit the project website at 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

Langley, WA 98260

Flying training missions on weekends is not mentioned in the Navy's Growler jet draft environmental impact statement (EIS), which is open for comment until Jan. 25. Neither is the addition of 42 more Growlers on top of what's in this EIS, bringing the total to 160, which doesn't count several incoming squadrons of other types of jets. But a Navy representative confirmed the extra 42 Growlers, and the Forest Service's draft permit says the Navy will be allowed to fly on weekends 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." Why is this additional flight time period not mentioned in the EIS? It has long been understood, and the EIS acknowledges, that the Navy will cooperate with local officials and populations by not flying training missions on weekends and holidays. Neither the City of Port Townsend nor any of our neighboring communities have had the opportunity to evaluate these additional noise impacts. Weekends are peak times for local economies, and to have that quiet obliterated by jet noise from a rapidly expanding mega-base spells economic downturn. People come here throughout all four seasons to relax in peaceful, unspoiled surroundings. To not disclose weekend flying in the EIS, and then to extend such a courtesy to the big game hunting industry without consulting with municipalities and other economically viable (and vulnerable) tourism and recreation entities, is unwise, irresponsible and does nothing to rebuild the broken trust between the Navy, the Forest Service and the public. One hundred and sixty jets and weekend flying will also invalidate the Navy's already flawed noise-level projections. In agreement with this Letter to Editor of Port Townsend Leader from Jan 4, 2016 by Karen Sullivan.

1.a. Thank You

12.h. Tourism

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

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

2.d. Program of Record for Buying Growler Aircraft

3.h. Runway Usage, Flight Tracks, and Altitudes

Langley, WA 98260

Actual noise measurements were not made in this EIS. Other National Park Service measurements are far higher. Water contamination in wells is not addressed. Citizens have been, and it seems will continue to be poisoned. Impact on CHILDREN is not adequately addressed. Childhood learning disabilities and hearing damage, impact on Coupeville School classrooms and in Rhododendron Park. Economic impact of weekend flights, tourism, property value losses, loss of business is not addressed adequately. Impact to natural resources like Ebey's landing national historic reserve and animal and bird populations and habitats not addressed. Frequency of fuel dumping and other spilling accidents not addressed.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.f. Fuel Dumping

Seattle, WA 98107

Please do not allow increased flights over the Olympic Peninsula -- the noise and additional climate impacts will hurt people and wildlife and ruin the serenity of this beautiful area. Don't do it.

1.a. Thank You

18.a. Climate Change and Greenhouse Gases

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

4.m. Supplemental Metrics

Woodinville, WA 98073

As a state resident who loves to visit the Whidbey Island area and spend my tourist dollars I have to protest this plan. It is a miracle I convince to me but horrible for the residents of the area. You will make their homes just about inhabitable as well as unsellable. Particularly unfair is that 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. Until this is known how can you impact the public in this way??

1.a. Thank You

12.h. Tourism

4.a. General Noise Modeling

4.r. Nonauditory Health Effects



Public Meeting Comment Form

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- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 7.g. Ebey's Landing National Historical Reserve

1. Name [REDACTED]

2. Organization/Affiliation _____

3. Address [REDACTED] Cville 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

The increase in the number of flights will affect our quality of life, our property values, our tourism economy, and the pristine environment we hold dear. The negative impact on our day to day living is far greater than the benefits to the increased flights. I urge the Navy to explore other alternatives or methods for pilot training. Set out on urban environment already polluted by noise. We live in a National Reserve that was, by an Act of Congress, protected in perpetuity from development. This is an overous

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

Port Townsend, WA 98368

Dear sirs, After being woken by over-flying Growlers in the middle of the night many times, I am simply amazed that you are planning to add 35 more of the aircraft and are predicting 35,000 overflights of these aircraft. And without an adequate and thorough EIS to evaluate the actual impact of these aircraft. They fly low over Port Townsend and the sound is amplified by the waters surrounding the Quimper Peninsula. I can only imagine the agony that residents of Whidbey Island must go through. I have read the very detailed comments prepared by the "North Olympic Group" and have chosen not to repeat them in this letter, preferring to assure you that individuals are adversely affected by the overflying aircraft. However, I am greatly disturbed by how much has been left out of the EIS to date. I do hope the Navy will respond to those detailed concerns. Thank you for considering public input, Sincerely, [REDACTED]

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.a. General Noise Modeling

1.a. Thank You

Coupeville, WA 98239

I totally support the Navy's use of the outlying field. Whidbey NAS has been here for decades, every prospective home buyer on Whidbey has been made aware of this usage for years. No one was neither not informed or forced to make a home purchase without this information. It's a very small price to pay to ensure our nation's freedom.

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?

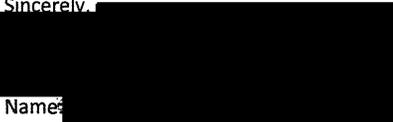
I also understand that a similar aircraft practices in Mountain Home Idaho AFB, home of the 366 Airforce wing. In fact, the 390th Electronic Combat Squadron, which I believe includes the Electronic Attack Squadron, located at Naval Air Station Whidbey Island, Wash., is assigned to the 366th Operations 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:  1007 ANNE'S LIA 98365

cc: Hon. Derek Kilmer, U.S. Congressman, 6th 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

Coupeville, WA 98239

I was born and raised in Coupeville at what is now known as [REDACTED] of Ebeys Prairie. I am the granddaughter of [REDACTED]. He was the first generation of our family to own and operate the farm. He even won an award presented to him by the president one year for the most bushels of wheat grown per acre of land. That being said, I have seen many changes come to our Island. Mostly in Coupeville, as that's where I lived and went to school. I no longer live there full time, but have a home on 2 acres located in the Ebeys Landing reserve. The last few years I've noticed a significant jet noise increase around my property, and even my friends property who lives on Camano Island. I don't know what the answer is, but when a whole community has to decide whether or not to change your plans for the evening because of the jet noise . Or my cousin Georgie has to consider bringing her workers inside away from the noise in the fields because let's face it , it is ear shattering. And I don't know where OSHA stands on this particular subject, but I'm sure they have something to say about workers being subjected to this level of noise. I'm pro navy all the way! But can't we find a reasonable solution?

1.a. Thank You
12.e. Agriculture Analysis
4.m. Supplemental Metrics
4.r. Nonauditory Health Effects

Coupeville, WA 98239

I was born and raised in Coupeville at what is now known as [REDACTED] Farm of Ebeys Prairie. I am the [REDACTED] of [REDACTED]. He was the first generation of our family to own and operate the farm. He even won an award presented to him by the president one year for the most bushels of wheat grown per acre of land. That being said, I have seen many changes come to our Island. Mostly in Coupeville, as that's where I lived and went to school. I no longer live there full time, but have a home on 2 acres located in the Ebeys Landing reserve. The last few years I've noticed a significant jet noise increase around my property, and even my friends property who lives on Camano Island. I don't know what the answer is, but when a whole community has to decide whether or not to change your plans for the evening because of the jet noise . Or my [REDACTED] [REDACTED] has to consider bringing her workers inside away from the noise in the fields because let's face it , it is ear shattering. And I don't know where OSHA stands on this particular subject, but I'm sure they have something to say about workers being subjected to this level of noise. I'm pro navy all the way! But can't we find a reasonable solution?

1.a. Thank You

12.e. Agriculture Analysis

4.m. Supplemental Metrics

4.r. Nonauditory Health Effects

1.a. Thank You

New York, NC 73105

xsddmj <http://www.FyLitCl7Pf7ojQdDUOLQOuxTXbj5iNG.com>



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 USA

3. Address [REDACTED] Lopez 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 to receive a CD of the Final EIS when available

I live at the south end of Lopez -
Sometimes the noise is unbearable.
Why can't the military fly over the water
instead of my house?

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

1.a. Thank You

Lopez island, WA 98261

A very good example of horrible jet noise is happening right now, Feb 13th, 1254. Of course it has been going on for hours. Today, it is even more obnoxious than usual. PLEASE restrict your flying.

Langley, WA, WA 98360

The DEIS needs to consider -water quality & aquifer contamination -noise impact on children/schools -natural resources impact -crash frequency -economic impact (tourism, property values)

1.a. Thank You

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

Langley, WA, WA 98260

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

Protect the lands from destructive military practices. We already have a significant island wide water problem from the unintended consequences of similar practices.

Bainbridge Island, WA 98110

1.a. Thank You

4.r. Nonauditory Health Effects

Not only do I think more Growlers should NOT be added to Whidbey Island (due to the excessive noise they produce and the potential for crashes), I DO NOT WANT Growlers in and around Olympic National Park and other Washington state parks. People go to our parks and mountains to relax and enjoy nature, not to hear loud military aircraft constantly flying overhead. PLEASE - Go somewhere else for your training. We do not want it in our wilderness areas and in our back yards. Excessive noise is a health issue for everyone. While I appreciate the need for national security, you also need to appreciate the substantial impact you're having on citizens' lives on a daily and hourly basis.

1.a. Thank You

Chimacum, WA 98325

Growlers do not bother anyone. There is a faction of people who are just anti military and they use the noise, etc as their cover

Oak Harbor, WA 98277

- 1.a. Thank You
- 2.a. Purpose and Need
- 2.e. Public Involvement Process

When did the peace of nature and our gorgeous island get thrown to the lions in favor of MORE and MORE LOUD JETS???? Who said that was just fine? NO one ever asked the residents of this special place if they minded getting shocked into driving badly by a low-flying jet, or have to turn off the music and TV and stop all phone conversations while a JET tears up the skies above. Why is this considered so "necessary" when we are not at war?????????

1.a. Thank You

Coupeville, WA 98239

Thank you, from the bottom of our hearts, for the training operations at OLF. We understand America needs a strong, well trained military. We love watching the Growler perform and support NAS Whidbey. Keep emailing flying!

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
- 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

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:

My wife and I have owned our property on the
S.W. end of Lopez Island for 54 years. Over this time
period we have witnessed quite a change in the
number of flights, types of aircraft, & the noise level
of the aircraft. These last two types of aircraft have been
the most disturbing of them all. We realize we must share
this space together. We ask you for your help in trying
to minimize the noise coming from the Navy aircraft.

Langley, WA 98260

Alternatives 1. No alternatives to Whidbey Island were considered. The reasons given for not reviewing off-island alternatives - a 40-year history, travel distance, expense - are merely mentioned, not given a serious, hard look. The 1,500-page draft fails to show that there are not more suitable locations than Whidbey. There are no comments regarding the suitability of locations such as NAS Fallon, Nevada. 2. The DEIS also does not address a potential national security threat. It says nothing about why our country should have all its electronic attack equipment in one location. Especially on an island that is: 1) susceptible to terrorist attack because it is only accessible by bridge or ferry; and 2) in an area of the country susceptible to earthquake and tsunami. Noise 1. Actual noise measurements were not made by the Navy, only modeled by computer. The model used 365 days/year to arrive at the average daily decibel level instead of the actual non-weekend number of flying days flown per year - making the decibel level appear lower than it actually is. 2. Actual measurements by residents have recorded levels as high as 130 decibels during flyovers - far above the 80 dB that the DEIS indicates potentially cause hearing loss. 3. The effects of flyover noise on Coupeville Elementary students are not adequately addressed and the effects on students at the Middle and High schools are not addressed at all. Economic Impact 1. Coupeville's economy is highly dependent on tourism and small-farm agriculture - a potential increase to 35,100 operations from 6,100 will likely cripple Coupeville's tourism trade as well as residents' property values. 2. The DEIS does not refer to the effect on Coupeville's biggest draw - Ebey's Landing National Historical Reserve. There is no reference to the National Park Service's 2015 noise study, which measured two different points in Ebey's Reserve over a 30-day period. One representative 24-hour period cited in the NPS study recorded 281 "military aircraft events" that exceeded 70 dBA - 10 dBA over the limit deemed to interrupt speech by visitors. Public Safety 1. The DEIS does not adequately address the potential for increased accidents in the potential six-fold increase in flights at the OLF. Pilots are trainees learning new, dangerous maneuvers, increasing accident risk above routine flights done by seasoned pilots. Accidents result in the use of fire-fighting foams with chemicals that have contaminated private and public drinking water wells near OLF. 2. The EPA's Health Advisory Levels for two of these chemicals - PFOA and PFOS - is 70 parts per trillion (PPT). The Navy is currently testing wells for three chemicals, PFOA, PFOS and PFBS - all of which the EPA lists as likely human carcinogens. So far, 10% of wells tested are above EPA limits - one as high as 440 PPT. These banned toxins are still being stored on Whidbey for emergency use and increased flight operations will increase the risk of accidents, fires and the need to use the foams. Summary We are not anti-Navy. And we definitely support the need to train our pilots. But we don't think it's reasonable to put our nation's entire electronic warfare in one location (Whidbey). Nor do we think it's fair to increase one small town's burden from 6,100 operations each year to a potential 35,100. We encourage the Navy to find other expansion alternatives to Coupeville.

1.a. Thank You

1.e. Risk of Terrorist Attack

11.d. Per- and Polyfluoroalkyl Substances

12.h. Tourism

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.n. Alternatives Considered But Eliminated

3.a. Aircraft Operations

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.q. Potential Hearing Loss

5.a. Accident Potential Zones

5.d. Environmental Health Risks and Safety Risks to Children

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 Citizen

3. Address [REDACTED] Freeland, WA 98249

4. Email none

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.k. Compensation to Citizens for Private Property
- 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.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 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 live about 13 miles south of OLF/Carp with a view the Growlers when seen they are flying thru. My home overlooks Admiralty Point at Bush Pt. & one day a couple of summers ago a Growler came landing down at a low altitude over the water. On its way back a few minutes later it sounded as if it was backing up. That incident caused a window to crack in a neighbor's home.

Some weeks later (as I remember), when I heard planes flying close I looked out & saw 5 Blue Angels. I am here to tell you that 1 Growler is louder than 5 Blue Angels!

One day in the Fall of 2015, I visited a farm friend in Oak Harbor (Cass Farm, the oldest working farm on Whidbey Island - about 135 years), when some Growlers that had just taken off (near April Field) flew right above. It was excruciating! What about the children??

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

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



Public Meeting Comment Form

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1. Name [REDACTED]

2. Organization/Affiliation International Mountain Bike Association

3. Address Colorado Springs, CO

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 deeply concerned about the sheer volume of
misinformed cry-baby libtards lingering outside this
venue! When will this 60's generation die off?

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.n. Quality of Life

Victoria, British Columbia v9c2b5

Your noise already ruins our walks on the beach and even gardening in our own yard. To make it worse is the height of bad manners. Please be a good neighbour and keep your noise contained to your own property.

1.a. Thank You

Oak Bay Mnciality, British Columbia V8S2N8

Thank you for those noisy aircraft that often remind us of the protection they provide our free countries. ■■■

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

[REDACTED]
Coupeville, WA
January 6, 2017

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

To Who It May Concern:

As a US taxpayer and a resident of Coupeville, Washington, I write to express my strongest opposition to both the present Whidbey Island Growler program and the Navy's future plans to expand that program with the addition of more planes and more flights.

Surely the Navy realizes that the locality adjacent to the outlying field near Coupeville (OLF), Coupeville itself, Ebey's Reserve, and the surrounding environs have changed considerably since the early days of flights out of the Navy base in Oak Harbor. The population has increased and more homes have been built.

In its planning to increase the number of Growlers and touch-and-go training in and around Oak Harbor (including the OLF) the Navy needs to access this change in the neighboring communities and reconsider its decisions. Is this really the best place to increase a program that, in its existing scope and shape, is already very unpopular with many Coupeville residents, including all of my friends and acquaintances, and has a devastating impact, both in noise and in pollution, on an area growing in population? When the Growlers are training at the OLF, ordinary folks in Coupeville going about their daily routines, schoolchildren at the public schools, and local businesses suffer from the noise, pollution and disturbances caused by the immediacy of the flights.

I have been working in my yard in Coupeville when the planes fly overhead (are they really supposed to be flying over the town of Coupeville?) and have been deafened by the roar of the planes. Under these circumstances, it is impossible to have a conversation with anyone near me.

Surely there is a better, more remote place where the Navy can manage its training.

Very truly,
[REDACTED]

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.a. Regional Land Use and Community Character

Coupeville, WA 98239

1.a. Thank You

2.n. Alternatives Considered But Eliminated

I am very concerned about the Navy adding more Growler operations at Outlying Field. I think that the noise impact on wildlife and citizens is at greater risk than when the Navy started on Whidbey and I think that the flight operations need to be re-visited and moved to avoid conflict with the population on Whidbey and quality of life for citizens and wildlife. The facts are there - the decibel levels and the increase in population. This should be re-addressed to include these into the equation. Thank you.

[REDACTED]
 Coupeville, WA 98239
 [REDACTED]

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

RE: NAS Whidbey Island Growler FCLP increase at the OLF

Dear Sirs:

I am a retired attorney living in the town of Coupeville, Washington. My husband and I built our house in Coupeville in 2010 and we have lived on Whidbey Island full time since then. We moved to Coupeville in Central Whidbey for several reasons. We love the rural atmosphere, the National Historic Preserve, and the Island Life. We also have a daughter and son-in-law who live nearby with their two young girls. They have a small farm on Conn Road, which is about a mile from the Outlying Field (OLF) where the Growlers practice carrier landings.

We moved to Whidbey when the earlier planes, the "Prowlers" were flying patterns at the OLF and although it was loud when they flew, it was for a limited period of time and we were willing to adjust to the noise in order for the pilots to get their required practice.

However, when the planes were switched to the "Growlers", we noticed a marked increase in the noise. I have been outside at my home in Coupeville during practice and although the jets are not supposed to fly over the town, they have flown directly over my house, extremely low and very loud. But I am more concerned about my grandchildren. I have taken my 10 year old granddaughter to soccer practice at Rhododendron Park (which is about 100 yards from the OLF) and watched while about 20 little girls fell to the ground covering their ears while the Growlers flew over head. The jets fly over the elementary school as well as over the high school and middle school where hundreds of children, including my two grandchildren, have their studies interrupted on a regular basis. When the jets fly over our grandchildren's house on Conn Road, it is so loud that you can't hear someone speak...even indoors.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.a. Groundwater
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.a. Regional Land Use and Community Character
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

I have now heard that the Navy is considering increasing the number of Growler flights to what could be as many as 35,000 FCLP per year at the OLF. When the flights were limited to about 6,000 FCLP per year, we could deal with it, but more than that is dangerous to our grandchildren's health, their studies and their life.

We have other objections to an increase in FCLP at OLF. The flights are a serious disruption in our lives in Coupeville. They disrupt the wildlife and birds that frequent Central Whidbey. They are not compatible with the National Historic Reserve and the tourism that the National Park draws to Central Whidbey. And they have a detrimental impact on the ground water and safety of the residents in the area. However, I have seen the impact that the increased jet noise has on my grandchildren and such an increase is not acceptable.

Please find somewhere else to train our Navy pilots. Central Whidbey has changed in the last 20 years: more homes, more people, more tourism, more protected area with wildlife, and more vulnerable children. It is no longer compatible with tens of thousands of Growler flights per year.

Thank you for considering my letter and the issues that it raises.

Regards,



Sent by email and US mail

Seattle, WA 98117

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

Please grant a 45 day extension on this timeline so that citizens have ample time to submit comments. Thank you, [REDACTED]

Coupeville, WA 98239

I am a retired attorney living in the town of Coupeville, Washington. My husband and I built our house in Coupeville in 2010 and we have lived on Whidbey Island full time since then. We moved to Coupeville in Central Whidbey for several reasons. We love the rural atmosphere, the National Historic Preserve, and the Island Life. We also have a daughter and son-in-law who live nearby with their two young girls. They have a small farm on Conn Road, which is about a mile from the Outlying Field (OLF) where the Growlers practice carrier landings. We moved to Whidbey when the earlier planes, the "Prowlers" were flying patterns at the OLF and although it was loud when they flew, it was for a limited period of time and we were willing to adjust to the noise in order for the pilots to get their required practice. However, when the planes were switched to the "Growlers", we noticed a marked increase in the noise. I have been outside at my home in Coupeville during practice and although the jets are not supposed to fly over the town, they have flown directly over my house, extremely low and very loud. But I am more concerned about my grandchildren. I have taken my 10 year old granddaughter to soccer practice at Rhododendron Park (which is about 100 yards from the OLF) and watched while about 20 little girls fell to the ground covering their ears while the Growlers flew over head. The jets fly over the elementary school as well as over the high school and middle school where hundreds of children, including my two grandchildren, have their studies interrupted on a regular basis. When the jets fly over our grandchildren's house on Conn Road, it is so loud that you can't hear someone speak...even indoors. I have now heard that the Navy is considering increasing the number of Growler flights to what could be as many as 35,000 FCLP per year at the OLF. When the flights were limited to about 6,000 FCLP per year, we could deal with it, but more than that is dangerous to our grandchildren's health, their studies and their life. We have other objections to an increase in FCLP at OLF. The flights are a serious disruption in our lives in Coupeville. They disrupt the wildlife and birds that frequent Central Whidbey. They are not compatible with the National Historic Reserve and the tourism that the National Park draws to Central Whidbey. And they have a detrimental impact on the ground water and safety of the residents in the area. However, I have seen the impact that the increased jet noise has on my grandchildren and such an increase is not acceptable. Please find somewhere else to train our Navy pilots. Central Whidbey has changed in the last 20 years: more homes, more people, more tourism, more protected area with wildlife, and more vulnerable children. It is no longer compatible with tens of thousands of Growler flights per year. Thank you for considering my letter and the issues that it raises.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.a. Groundwater
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.a. Regional Land Use and Community Character
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

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. 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." 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.

Lopez Island, WA 98261

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 01/08/16 www.QuietSkies.info 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

- 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

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

1.a. Thank You

Victoria, British Columbia V8w1m2

No more growlers on the island They are disruptive and to add 35 more is unfair to us

2/23/17

GAUSH0001

[REDACTED]
Coupeville, WA 98239

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

Response to November 2016 U.S. Navy Draft Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

There are underlying concerns with this EIS. First the description of requirements for an Off Site Landing Field (OLF) are written specifically to describe only the current OLF Coupeville field, all other options are immediately rejected even though this field was not designed for Growlers and due to the narrower pattern requiring steep banking cannot be fully utilized with Growlers. " In recent years, however, due to a non-standard pattern on Runway 14, the utilization of Runway 14 has been significantly lower. This narrower pattern requires an unacceptably steep angle of bank for the Growler due to performance differences from the former Prowler flying the pattern." (Affected Environment, p. 3-11)

Second, placing all Growlers at one base is simply repeating our national vulnerability that was evidenced at Pearl Harbor. Should this base be rendered inoperable we have no backup. Being located on an island with only a two lane bridge built in 1935 or a ferry for vehicle access increases the vulnerability of this site.

Third, the EIS underestimates the areas that are impacted by the noise levels. The EIS omits critical structures such as the Coupeville School District Middle School and High School, the Coupeville Hospital and the Rehabilitation are all omitted as critical sites. This and the noise impact averaging makes it appear that our children are only subjected to noise once an hour from Preschool to 5th grade, while this impact is for all 13-14 years of their education. In reality this noise is not spread over the year but happens continually while 3 to 5 Growlers circle overhead doing 8-10 touch and gos each. This is not once an hour but 24-50 times in one academic session. The Navy notes that it tries to not fly during state and national testing periods. As a parent I believe the daily instruction and learning time is much more important to my children's success in life. I see that the EIS acknowledges there may be cognitive delays in children exposed to this level of noise. How much cognitive delay is considered acceptable??

Fourth, the town of Coupeville is one of the oldest in Washington state. Many buildings are over 100 years old with foundations appropriate to the time and situated on an unstable glacial till base. The vibrations from the Growlers are felt within these and newer structures and can only be aggravating an already frail base.

Fifth, the EIS mentions several times that moving the OLF would only irritate more people, discounting the concerns voiced in the local area because it is a small town. Do small town citizens really count less than those from larger areas. Sixth, the impact on wildlife is underestimated. The area of impact is underestimated and assuming that wildlife is already accustomed to the current noise level and would thus adjust to a 6 to 10 fold increase has no scientific basis, either for the current adjustment or for future impacts. True research needs to be done, not using other species.

Seventh, the impact on the area of this increase in population is underestimated. It does not recognize the nondependent people who enter the area due to military personnel - the grandmother, former mother-in-law, former spouses, those who discontinue their military service but remain in the area. All of these impact local social services. In a small area these services are already stretched thin or are unavailable.

The Navy has offered several scoping meetings, but does not advertise that the comments made to personnel at these meetings are not reported back to the EIS considerers unless they are recorded. Very few recorders are available and people often leave believing they have had their voice heard when they have not.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 10.a. Biological Resources Study Area
- 10.c. Wildlife Sensory Disturbance and Habituation
- 12.l. Community Service Impacts
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 3.e. Field Carrier Landing Practice Patterns
- 4.o. Classroom Learning Interference
- 5.c. Condition of Outlying Landing Field Coupeville
- 8.c. Noise and Vibration Impacts to Cultural Resources

Coupeville, WA 98239

I'm a supporter of the Navy, an integral part of our culture and economy here on Whidbey. We used to live in Oak Harbor, and moved to Coupeville about 6 yrs ago. We live on [REDACTED] Road, directly under the east side flight pattern. When we first moved here, the Prowlers were flying over our property – right over our garden. We thought it was pretty cool to watch them so close. Since the departure of the Prowlers, the Growlers haven't been flying that pattern, but I've experienced the horrendously deafening sound directly under them while 1) walking my dogs at Patmore Pit Dog Park, 2) on the soccer fields where our kids play at Rhododendron Park, 3) while visiting friends at Admiral's Cove. And of course, being close but not directly under them in so many other areas of our community (schools, the market, the post office, the Prairie in Ebey's National Historic Preserve). I can easily hear them when the planes are flying from my home. I've left the house to walk the dogs when all is quiet, only to have the planes show up while I'm at Patmore Pit flying directly overhead. If I don't carry earplugs with me, I must leave immediately because it is literally painful, even with my fingers stuffed in my ears, as they fly over. Our kids must wear ear plugs when they play soccer at Rhodie Park, where the planes also fly directly overhead. For most of them, earplugs are uncomfortable and hard to keep in place, especially the younger kids with smaller ears. They can't hear their coaches while wearing ear plugs. The kids literally stop on the field with every flyover, all standing with their hands over their ears. Protecting their ears is not an overprotective mom's response; as I mentioned above, it is PAINFUL. At my friend house in Admiral's Cove, same thing: painfully loud. I'm grateful they haven't been flying on our side of Hwy 20. I feel horrible that she, her family, and their neighbors have to suffer. Will I have the same, with increased numbers, over my house soon? I've read letters in the paper written by off-island visitors that they'll never come to Whidbey again because the planes were so loud and their vacation was ruined. We rely, especially in Central Whidbey, on the tourism that our special environment and historical heritage offer. WE can't afford to lose these visitors. Our farmers, another significant element in our economy, must work under the flight conditions, provide ear protection, sound monitoring, and hearing tests to their farm hands. Who pays for that? I'm very concerned about our property values declining with increased flights and expanded Accident Potential Zones. We did purchase our property knowing the relative location of the OLF, but the number of flights was lower, and the Growlers didn't fly over our property. There was a maximum number of flights under a flight easement; this proposal exceeds that ceiling that we accepted when moved here. As I mentioned at the beginning, I support the navy, but I also support our community. Unfortunately, this issue has become extremely polarizing. If anyone, citizen, business owner, or elected community official, voices concern, they are branded "Anti-Navy". It's getting very ugly; it doesn't have to be this way! Instead of black/white, Navy/No Navy, Planes/No Planes, we must find a balance. 1. As we did during the space age of the '50's & '60's, we need to put our American engineers to work to SOLVE THIS PROBLEM. a. Develop specifications that have all the performance and power requirements needed by our fleet b. Include maximum sound level requirements that makes living under these aircraft tenable! 2. Build our kids an indoor sports complex where they can play soccer, baseball, softball, football, and more. 3. I don't know what the solution is for the tourists we host, or the farmers, other than to make the planes

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.j. Impacts on Outdoor Sports

quieter. 4. Compensate homeowners for losses in property values. 5. Provide support to businesses who have financial loss caused by decreased visitors. 6. Until the sound issues can be mitigated, and THAT is truly the key, we must keep the number of flights over our community to an absolute minimum. And the water issue? Yeah, that has us very concerned. Our aquifer is very deep, and interconnected. Very troubling. Terrifying. Finally, my last concern is not a local one, or even a regional one. I paid attention to my high school history teacher. I don't understand the logic of consolidating the entire electronic warfare fleet here on Whidbey. Like Pearl Harbor, it makes for an excellent target by an enemy with ICBM capabilities or other means to attack our fleet. To Conclude: 1. Keep the planes flying, BUT 2. Engineer a sound mitigation solution 3. Until a mitigation solution can be implemented, a. Keep flights to a minimum b. Provide alternative solutions to community and business members c. Compensate home and business owners for losses 4. Distribute the fleet! Thank you for your service.

1.a. Thank You

Coupeville, WA 98239

My wife and I own 11 acres 1/2 mile east of the OLF. The frequency and volume of the jet training traffic noise does not negatively impact our daily lives. NAS Whidbey has been a part of the culture and pride of island life. We understand the need for naval aviators to train at the OLF in Coupeville and are proud to support the navy. More noise is created EVERY DAY by the constant shooting of firearms at the Sportsman Club near the OLF, than the weekly, short-duration noise of navy jets. Why does no one complain about that?

Langley, WA 98260

I am stunned by the Navy's perspective that it can destroy a quiet community with it's incredibly noisy Growlers. Peoples lives are being ruined by the choice by the Navy have it's flight path right over Coupeville and now the Navy plans to expand this waste of Taxpayer money Five Fold. This choice to destroy the seat of Island County is disruptive, and economically distructive to the citizens of Island County and especially Coupeville. Furthermore now it is being discovered that chemicals from the Jets are getting into the already challenged Sole Source aquafer in this small and previously peaceful town on Whidbey Island. There has got to be a better way.

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
12.c. Socioeconomic Impacts
12.n. Quality of Life

1.a. Thank You

Seattle, WA 98122

The Growler aircraft are seriously too noisy and dangerous for such a highly populated area.

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 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
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- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
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- 4.j. Other Reports
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- 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

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

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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.

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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 THINK YOU (LISA) DON'T GIVE A DAMN ABOUT
 the people. You run things just for yourselves.
 You conduct tests w/ bogus parameters so
 you look good. Send the Growlers to
 NEVADA or UTAH - lots of room; no people.
 Give 'em to the USAF!

LANGLEY, WA 98260

Although I live in Langley - I am an active member of the Whidbey Island Nordic Lodge on Jacobs Road in Coupeville – and therefore have a vested interest in what is happening in that area. Also, I frequently find myself in the Coupeville area for many recreational and cultural activities, especially kayaking in nearby surrounding waters and hiking trails within the Ebey's Landing National Historical Reserve. The increase in noise level over the Nordic Lodge property would surely result in the total demise of the Lodge, whose sustainability is dependent on rental of the building to others in the community when not in use by Lodge members. Simply put, no one would want to rent our Nordic Hall for group activities due to the noise levels resulting from the incredible increase of flying over the area. And consequently, the cultural activities the Lodge itself brings to Whidbey Island, honoring the rich Scandinavian history of the island, would also come to an end. Kayaking in the waters surrounding that part of the island has been mostly a peaceful, meditative activity for me for 15+ years. It would not be so with the proposed increase of EA-18G airfield operations at OLF. Hiking the trails in the nearby forests and through the Ebey's Landing National Historical Reserve would also no longer be the peaceful and reflective activity (given its historical significance) it is on most days at the present time. "Ebey's Reserve is a national model for sustainable development in rural communities. It is the only remaining area in the Puget Sound region where a broad spectrum of Northwest history is clearly visible on the land, and protected within a landscape that is lived in and actively farmed. It is a place that is sustained using contemporary conservation strategies, local stewardship, and by leaving the land in primarily private ownership, while preserving its historic, cultural, and rural character." ([REDACTED] Ebey's Landing National Historical Reserve Trust Board, in Dept. of the Interior National Park Service et al., Ebey's Landing National Historical Reserve Long-Range Interpretive Plan, September 2009.) In summary, the Coupeville area overall has a rich cultural heritage that needs to be honored. The reduction of flying at OLF since about 1998-1999 seems to have honored that history. The Navy's current proposal is plainly unreasonable and destructive to Whidbey Island from environmental, cultural, historical and economic perspectives - and unnecessary given that there is an alternative -- [REDACTED] .

1.a. Thank You

12.f. Economic Hardship and Impacts

7.d. Recreation and Wilderness Analysis and Study Area

8.e. Outlying Landing Field Coupeville and Coupeville History

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

Federal Way, WA 98003

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

It seems to me that if the Navy proceeds with the expansion of Growler flights over the San Juan islands, it amounts to the government taking private property exercising through its right to eminent domain, but the property owners should be compensated. I do not own any property in the area but as a resident of WA state I am horrified by what the Navy is doing in our state. They are ruining one of the last best places on earth.

Federal Way, WA 98003

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

It seems to me that if the Navy proceeds with the expansion of Growler flights over the San Juan islands, it amounts to the government taking private property through its right of eminent domain, but the property owners should be compensated. I do not own any property in the area but as a resident of WA state I am horrified by what the Navy is doing in our state. They are ruining one of the last best places on earth.

Nordland, WA 98358

1.a. Thank You

2.n. Alternatives Considered But Eliminated

TOO MUCH NOISE !!!!! Why on earth won't you move these operations to unpopulated areas.

1.a. Thank You

Mooresville, NC 28115

As a former user of OLF Coupeville, I can honestly say it helped prepare for night carrier landings unlike any other airfield available in the Pacific Northwest. The lack of ambient lighting created a realistic carrier environment that couldn't be replicated at NAS Whidbey. Close proximity to NASWI makes it an indispensable asset. OLF COUPEVILLE is a national treasure!

1.a. Thank You

Oak Harbor , WA 98277

COER and their nuisance suit are wasting time and taxpayer money by continuing to drag this out. Frankly, I find it fitting that every time I try to type in COER, my devices all auto-correct it to say "COERCION"! I work next to the flight line, and I, too, live in the flight path. And, while I didn't know how loud the planes would be when I accepted this job from another state, I quickly figured it out and chose to live at the south end of the island (away from the planes) for the first 6 years I lived here. Yes, we have to pause conversations sometimes. Yes, we have to pause our movies and TV shows sometimes. But we all knew what we were signing up for when we chose to live in the established flight paths of these powerful (amazing) birds! You can't move next door to a pig farm and complain about the smell, and you can't move near an air strip and complain about the planes! Are the new planes bigger, faster, and stronger? Yes! But guess what? Technology isn't going away - the next generation of planes will be even bigger, even faster, and even stronger. And, yes, potentially louder, as well. But one of the most beautiful things about living in a free country is that we are all free to choose where we work, play, and live. It's our right to pursue happiness; a right that is guaranteed and paid for by the brave men and women in those very planes! If living near the planes doesn't make you happy, feel free to move to a quieter part of the island - they do exist! The Navy isn't leaving. In fact, more people and more planes are coming. And there are only a very small number of families (4, I believe) that can claim they owned their land prior to the OLF being built. Nobody else has any cause to complain. It really is time to end this constant bickering and division. It's time to come back together in our community and in our country. It's time for each of us to take responsibility for our own choices and our own happiness. If they aren't happy living in their current location, they aren't helpless victims, they're volunteers! And, frankly, I'm offended that they are so offended! There will always be a cost to the few for the good of the whole. The noise here is one of the costs of the greater good. People need to accept it, or find a personal solution for it (like moving - or wearing ear protection if they insist on being ridiculous). Support our troops. Let them know that we believe they deserve the best possible training available to do a perilous job. Support OLF!!!



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

2. Organization/Affiliation Citizen of O.H.

3. Address OH WA 98277

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'm saddened that a few have made this such a divisive issue. Both the base (NASWI) and the Outlying Field (OLF) provide necessary services to our community, our beautiful island, and our nation. The concerns have been raised and addressed, and now it's time to end the in-fighting and move forward. The rewards far outweigh the inconveniences. The least we can do is support our military members and their families - it is a difficult job and a hard lifestyle. It's nothing to have to pause the TV or "hold" a thought compared to what they do. Worth it! Thanks!

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

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 Eastsound, WA. 98245
- 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

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:

Our dog barks when the jets fly by us.

We have lived on Orcas Is. for 38 years and never had a noise problem until the new jets arrived.



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- 1. Name
- 2. Organization/Affiliation
- 3. Address anacortes
- 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 appreciate the need to train our troops well but want to balance that with ensuring my community has good living qualities. Right ~~now~~ now we hear very ~~to~~ loud noise 1-2x/mo, several days/nights in a row (likely CIAs). I can live with that but really don't want an increase. Maybe an option is to begin the return approach turn more over Gwynes Channel instead of town & stay more over Rosario Strait.

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

Anacortes, WA 98221

The level of concern for noise in Anacortes is under represented. Anacortes is a small island surrounded by water that works much like an amplifier for jet noise. However, Oak Harbor, on Whidbey island, the largest island in the continental US, does not experience this same level of noise. Consider changing the flight pattern over the military town which is accustomed to this high level of noise. Family and friends from Oak Harbor are surprised when they visit our house (Dewey Beach) and experience our level of noise. I too am surprised when visiting Oak Harbor and hearing just a distant rumble of jet noise because the jets are over Anacortes. An investment in a change of flight pattern and possible flight line would help to ease this problem into perpetuity.

1.a. Thank You

3.a. Aircraft Operations

3.b. Flight Tracks and Federal Aviation Administration Regulations

3.h. Runway Usage, Flight Tracks, and Altitudes

3.i. Runway Operating Hours and Flight Schedules

1.a. Thank You

Seattle, WA 98122

I object to additional growlers at the Whidbey Island airforce base, the noise from the current aircraft is a menace to those who live in the San Juan Islands. We often feel like we live in a war zone and we're being strafed.

Oak Harbor, WA 98277-7903

My home is in the flight path for landing at NAS Whidbey(surfcrest beach just north of the base) and is un-inhabitable during training. The growlers fly at an altitude that I believe is in violation of flight safety rules. I have to wear sound cancelling headphones indoors during training. My wife is hearing impaired and feels that her current level of hearing is threatened by Growler landing operations.

- 1.a. Thank You
- 3.a. Aircraft Operations
- 3.f. Field Carrier Landing Practice Operation Totals
- 4.q. Potential Hearing Loss

Lopez, WA 98261

- 1.a. Thank You
- 2.a. Purpose and Need
- 2.c. Compliance with the National Environmental Policy Act

I have been a property owner on Lopez Island since 1988. Thanks to the EA-18G Growler airfield operations at the NASWI complex, quiet enjoyment of this beautiful environment is no longer possible. Jet noise literally comes flying out of nowhere and overwhelms the senses for anyone who is outside, and is quite noticeable inside as well. There are serious deficiencies with the EIS submitted to add over thirty more growlers, which other commenters have detailed at length. I cannot imagine that this expansion should be allowed. Allowing military expansion at the expense of the lives of San Juan County residents is wrong, not to mention unnecessary. Thank you.

port townsend, WA 98368

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Project Manager, I am writing to express my concern about the proposed Growler activity which would directly and adversely affect me and my family. I am a resident of Port Townsend and a frequent visitor to the Olympic National Park. I am a Marine Corps veteran and a retired attorney who moved to this area to enjoy the beauty and quiet of this special location in the Pacific northwest. I deeply troubles me that the increased Growler activity would severely and detrimentally impact my enjoyment of my home and environment on a daily basis. Please consider the following comments on the proposed DEIS. 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) 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: 4 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);

- 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.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 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.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

2014 EA (Growler electronic warfare activity); 2015 EIS discussing electronic warfare training and testing activity; The current 2016-2017 DEIS (36 Growlers); 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, socioeconomic, 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] Port Townsend, WA 98368

1.a. Thank You

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

Draft Environmental Impact Statement for EA-18G "Growler" Airfield
Operations at Naval Air Station Whidbey Island Complex
January, 2017 Comments

January 16, 2017

To Whom It May Concern,

I just wanted to add my name to the list of citizens who are suffering from the Growler noise from the Naval Air Station. We came to the San Juan Islands to enjoy the quiet of the natural world. The noise from the planes have been devastating to me and many people I know. It has changed our way of life drastically. I wish there was something that could be done. I feel so bad for the people who live on Lopez Island if it's this bad on Orcas Island.

[Redacted]
[Redacted]
[Redacted] Orcas Island

1.a. Thank You

Eastbound, WA 98245

Regarding: Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex January, 2017 Comments First Name: [REDACTED] Last Name: [REDACTED] Organization/Affiliation: Self Eastbound, WA 98245 (Orcas Island) January 16, 2017 To Whom It May Concern, I just wanted to add my name to the list of citizens who are suffering from the Growler noise from the Naval Air Station. We came to the San Juan Islands to enjoy the quiet of the natural world. The noise from the planes have been devastating to me and many people I know. It has changed our way of life drastically. I wish there was something that could be done. I feel so bad for the people who live on Lopez Island if it's this bad on Orcas Island. [REDACTED] Orcas Island

Seattle, WA 98107

1.a. Thank You
9.a. Consideration of Tribes

Are the people proposing this utterly insane? There are so many reasons why this is a ridiculously bad idea--from the horrific impact on the environment, to the disregard of rights of tribal communities, to the loss (temporary or maybe long-lasting) of a beautiful natural area that is a refuge from the tension, noise and toxic fumes of urban areas.

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 *I am commenting as a citizen, but I am employed as*

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

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

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 will volunteer my property at [redacted], as a monitoring site for in situ acoustic data. The Navy or its' contract can stage electronic gear for periodic or perhaps long term monitoring. My residence is on the south portion of Lopez Island. [redacted]

1.a. Thank You
12.n. Quality of Life

Clinton, WA 98236

Whidbey is one of the most beautiful places on earth and we need to keep it that way...increasing the Growler flights is against every kind of quality of life effort we can imagine!

oak harbor, WA 98277

I can not accept that the fate of Whidbey's prime farmlands is becoming contaminated by fire retardant, and that the extension of Growler flyovers is literally causing farms to shut down. This is utterly tragic. There's plenty of space over the ocean that could be used to minimize the damages of the current flight patterns.

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis

1.a. Thank You

Oak Harbor, WA 98277

I completely support NAS Whidbey Island. I plan to do what I can to support any way I can.

snohomish, WA 98291

It is clear that the US Navy often forgets who pays their salaries. My wife and I (who have been paying those salaries for nearly 60 years) strongly object to ANY Navy activity in or above Olympic National Park/Olympic National Forest (hereafter "Olympic"), or any contiguous area which would adversely affect by sight or sound Olympic. It is bad enough when you waste valuable US resources playing soldier/flyboy, but don't do it on or over Olympic.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area

1.a. Thank You
19.d. Electronic Warfare

Greentown, PA 18426

The DEIS calls for an increase in the number of air field operations at Whidbey's Ault Field of up to 38,700 each year. It is not immediately clear how many of these activities will be operating over the Electronic Warfare Range, where the Navy has previously promised an increase of only 10% over its historical level of 1250 flights per year. Please do not make any increase to the number of field experiments over the Electronic Warfare Range and, if possible, do not may any increase to the number of field experiments performed at Whidbey's Aut Field altogether.

Port Townsend, WA 98368

I am shocked to hear that the Navy is intent on practicing "war games" over the Olympic Peninsula. This will have tremendous negative effects on the people who live there in small towns or reservations and who would be blasted by ear-shattering noise for hours at a time. The effects of hearing loss and stress on these people alone should be grounds to shut this idea down. Planes will not only be heard in the Park. In Pt Townsend, Sequim, Pt. Angeles and in fishing boats across Puget Sound, the deafening noise of those planes will disturb the peace. The Olympic Peninsula is also home to one of The United States' most popular yet remote National Parks. It is full of wildlife, some of it endangered, that would be harmed as individuals and as species by the terrifying sounds and sights of low-flying growler airplanes. Migrating birds fly through this area. These species are already struggling due to climate change and habitat loss. The noise, radar and other emissions can confuse the birds' navigational systems. This project would therefore disturb not only the birds of the Olympic Peninsula, but those that migrate to the north and south of here. Lastly, what of the Earth itself? Hundreds of thousands of gallons of jet fuel creating millions of tons of CO2 at low altitude over pristine wilderness-what are you thinking? And there's a chance that a plane or two will crash into one of those beautiful mountains and start a forest fire with its jet fuel in the ever-drier summer forest. The people who live on the Olympic Peninsula have the same right to life, liberty and the pursuit of happiness that every other American has. The Navy clearly believes that the Native and Non-Native people that live on the Peninsula will not have the will or ability to stop this affront. **DO NOT CONDUCT WAR GAMES IN MY NEIGHBORHOOD!**

- 1.a. Thank You
- 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.l. Bird Migration
- 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
- 19.d. Electronic Warfare
- 4.l. Points of Interest
- 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

Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

I used to take my mother-in-law and other visitors/tourists to different sites around Coupeville, but no longer. I'll never forget the day a jet flew over us when we weren't far from Ebey's Landing, and my mother-in-law was so frightened by the noise that she went into cardiac arrest. Fortunately she stabilized at the WGH emergency room, but we were both terribly frightened by the excessive noise and much-too-close proximity of these jets (which have no business flying over residential and park areas)! Please stop ruining our island and our peace of mind and do your touch& go somewhere else -- your presence here is dangerous!

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 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 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.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

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

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

I am extremely concerned about pollution of our aquifer from the flame retardants (as well as the jet fuel in general) that the Navy is using. The Navy is already having a negative impact on our farming community -- noise and air pollution -- what protections will you give us in regard to safeguarding the integrity of the soil and water that are under your fly-over sites?

1.a. Thank You

11.a. Groundwater

11.d. Per- and Polyfluoroalkyl Substances

17.a. Hazardous Materials and Waste Impacts

1.a. Thank You

10.m. Impacts to Marine Species and Habitat

Port Townsend, WA 98368

The EIS states that marine mammals have adjusted to the current noise levels so adding additional noise is not an issue since they will further adapt. You provided no research to back up the claim that animals have already adjusted. You reference no studies done to support your contention that further noise will produce no harm. Studies done on noise in the ocean produce significant negative impacts on cetaceans. Low level flights of growlers will undoubtedly impact marine mammals and other sea creatures. And further increases later will add to these issues. As you know, marine mammals are protected by federal law. Resident orca populations are listed as Endangered. Your EIS is wholly insufficient in considering the impacts of growler noise on both resident and visiting species.

1.a. Thank You

10.m. Impacts to Marine Species and Habitat

Port Townsend, WA 98368

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10.m. Impacts to Marine Species and Habitat

Port Townsend, WA 98368

The EIS states that marine mammals have adjusted to the current noise levels so adding additional noise is not an issue since they will further adapt. You provided no research to back up the claim that animals have already adjusted. You reference no studies done to support your contention that further noise will produce no harm. Studies done on noise in the ocean produce significant negative impacts on cetaceans. Low level flights of growlers will undoubtedly impact marine mammals and other sea creatures. And further increases later will add to these issues. As you know, marine mammals are protected by federal law. Resident orca populations are listed as Endangered. Your EIS is wholly insufficient in considering the impacts of growler noise on both resident and visiting species.

langley, WA 98260

1.a. Thank You
4.r. Nonauditory Health Effects

I believe the increase in flights with this program will be highly detrimental to the mental and physical health of our community and am asking you to reconsider. Thank you.

Langley, WA 98260

I am highly concerned about the proposed increase in flights. I think that the environmental and mental health/physical repercussions are far more damaging than any potential benefit. Please do not put our community at risk by increasing flights.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

langley, WA 98260

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

I am against the expansion of growler flights on whidbey island. I think it will further harm our communities to add any more flights and actually want all flights to stop.

langley, WA 98260

1.a. Thank You
4.r. Nonauditory Health Effects

I believe the increase in flights with this program will be highly detrimental to the mental and physical health of our community and am asking you to reconsider. Thank you.

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)
resident
3. Address [redacted] Langley WA 98260
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.
- 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:

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

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.

Prepared by Coupeville Community Allies
January 18, 2017

Sequim, WA 98382

I am requesting a 45-day extension period for the comments on this document. As you must be aware, the Forest Service has just issued it's decision to grant permit to the Navy to place the mobile electromagnetic emitters on FS land. The comment periods for both the Navy's DEIS and the FS decision coincide. Considering that DEIS is 1500 pages alone, this is an impossible timeframe for citizen review. Additionally, considering the fact that this is the middle of the holiday season and many citizens are out-of-town and extremely busy, I respectfully request a comment period extension of an additional 45 days.

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

1.a. Thank You

Colorado Springs, CO 80921

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

December 28, 2016

Dear Sir/Madam:

As a resident of Whidbey Island, I am writing to comment on the Draft Environmental Impact Statement (DEIS) for the EA-18G "Growler" airfield operations at the Naval Air Station Whidbey Island Complex. Below are my concerns:

1. The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading because they use 365-day averaging rather busy-day averaging, which would more accurately and appropriately reflect the noise exposure.
2. The Wyle modeled noise levels cited in the DEIS have not been validated with on-site noise data.
3. The DEIS relies on out-of-date medical findings regarding the impacts of noise on human health which are at odds with the plethora of contemporary research in this field of study.
4. While the Navy has adopted standards that protect its personnel from health and hearing harm due to excessive noise, these same standards are ignored by the DEIS for civilians exposed to the same or greater levels of noise.
5. By stating that civilians would need to be exposed to Growler noise for 40 years before they would experience a permanent shift in hearing, the DEIS fails to address the known and immediate medical consequences of excessive noise on hearing loss and tinnitus.

I hope that you will take these comments under consideration as you plan to revise the DEIS. I know a lot of time and effort will be involved in producing the final Environmental Impact Statement, but in my opinion, protecting the health of the civilian populations affected by the Growlers is paramount and certainly worthy of your due diligence.

Thank you for your attention to the above.

Sincerely,

[Redacted Signature]
[Redacted Address]
Oak Harbor, WA 98277
[Redacted Contact Info]

- 1.a. Thank You
- 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.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

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) [Redacted]
3. Address [Redacted] Oak Harbor, VA 98271
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.
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(over)

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- 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.

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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.

Nordland, WA 98358

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) 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

4.e. Day-Night Average Sound Level Contours and Noise

4.l. Points of Interest

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

Nordland, WA 98358

[REDACTED] Nordland WA 98358 EA-18G EIS Project
 Manager Naval Facilities Engineering Command (NAVFAC) Atlantic 6506 Hampton Blvd.
 Norfolk, VA 23508 ATTN: Code EV21/SS Dear Sir or Madam: My husband I and live on
 the Olympic Peninsula, home of the Olympic National Park, a thriving tourist industry, and
 an abundance of wildlife and sealife. The noise from the Growler flights adversely affects
 not only the people of this peninsula, but also the animals and creatures of the sea. We
 are asking that you consider an alternative site for the Growler flights to mitigate this
 impact. We believe that the DEIS was improperly drafted and failed to consider the
 negative impacts of the Growler flights based upon the following paragraphs:
 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. We appreciate you taking these concerns into consideration in making an
 analysis of the DEIS. Warm regards, [REDACTED]

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 12.n. Quality of Life
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.l. Points of Interest

Nordland, WA 98358

[REDACTED] Nordland WA 98358 EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic 6506 Hampton Blvd. Norfolk VA 23508 ATTN: Code EV21/SS Dear Sir on Madam: My husband and I live on the Olympic Peninsula, home of the Olympic National Park, a thriving tourist industry, and an abundance of wildlife and sealife. The noise from the Growler flight adversely affects not only the people of this peninsula, but also the animals and creatures of the sea. We are asking that you consider an alternative site for the Growler flights to mitigate this impact. We believe that the DEIS was improperly drafted and failed to consider the negative impacts of the Growler noise. We would like you to consider the following as well. 1. 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. 2. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in 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. 3. 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. 4. 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.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 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.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.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
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville

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. 5. 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. 6. 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. 7. 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>) 8. 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. 9. 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. 10. 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. 11. 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. 12. 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. 13. 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. 14. 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. 15. 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. 16. 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>) 17. 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. We thank you for your attention to this matter. Warm regards, [REDACTED]

From: [REDACTED]@gmail.com
 Subject:
 Date: February 13, 2017 at 1:38 PM
 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.

My husband and I live in the Olympic Peninsula, and have experienced the noise from the Growlers not only where we live but when hiking in the Olympic National Park and environs. Just about a month ago, we were hiking near La Push, WA and the other hikers and I had to stop our conversation and cover our ears by the Growler noise. The impact on the wildlife has to be devastating. I am a proponent of our Navy, and so appreciative of what you are doing for our county. But I do want you to consider the pristine nature of the Olympic Peninsula, home of the Olympic National Park, much wildlife, sealife, and a large population of people. Many of the businesses are tourist oriented, and the growler experience for our tourists is very negative. Thus businesses are adversely affected by the growler noise. Many people with whom I have spoken have experienced sleep interruptions, anxiety, and other physical ailments from the growler noise. An alternative site that is not so populated would be in the best interests of all.

We would appreciate it if you would also consider the following:

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>) 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).

We thank you so for considering this letter.

Warm regards,

[REDACTED]
 Nordland, WA 98358

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.d. Construction Impacts on Wildlife
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources

[REDACTED]
 Nordland WA 98358

EA-18G EIS Project Manager
 Naval Facilities Engineering Command (NAVFAC) Atlantic
 6506 Hampton Blvd.
 Norfolk, VA 23508

ATTN: Code EV21/SS

Dear Sir or Madam:

My husband I and live on the Olympic Peninsula, home of the Olympic National Park, a thriving tourist industry, and an abundance of wildlife and sealife. The noise from the Growler flights adversely affects not only the people of this peninsula, but also the animals and creatures of the sea. We are asking that you consider an alternative site for the Growler flights to mitigate this impact. We believe that the DEIS was improperly drafted and failed to consider the negative impacts of the Growler flights based upon the following paragraphs:

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.”

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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.

We appreciate you taking these concerns into consideration in making an analysis of the DEIS.

Warm regards,

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

[REDACTED]
[REDACTED]
Nordland WA 98358

EA-18G EIS Project Manager
Naval Facilities Engineering Command (NAVFAC) Atlantic
6506 Hampton Blvd.
Norfolk VA 23508

ATTN: Code EV21/SS

Dear Sir on Madam:

My husband and I live on the Olympic Peninsula, home of the Olympic National Park, a thriving tourist industry, and an abundance of wildlife and sealife. The noise from the Growler flight adversely affects not only the people of this peninsula, but also the animals and creatures of the sea. We are asking that you consider an alternative site for the Growler flights to mitigate this impact. We believe that the DEIS was improperly drafted and failed to consider the negative impacts of the Growler noise. We would like you to consider the following as well.

1. 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.

2. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in **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.

3. 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

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 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.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.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

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.

4. 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.

5. 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.

6. 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.

7. 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>)

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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>)

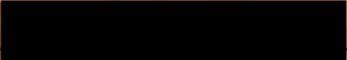
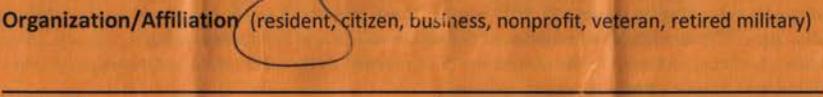
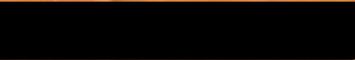
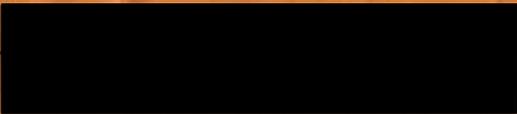
17. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous 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.

We thank you for your attention to this matter.

Warm regards,



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)

3. Address 
4. Email 

Comments

Check all that concern you. For additional information see
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
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

- 2
1
- 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:

Boing and GRUMMOND and Haliburton
 Don't need more help.
 HUMANS UNDER FIRE
 DO (SOUNDS TRUE 2me)

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
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
 - b. U.S. Senator Maria Cantwell: 425.303.0114; www.cantwell.senate.gov
 - c. U.S. Congressman Rick Larsen: 800.652.1385; rick.larsen@mail.house.gov
 - d. Governor Jay Inslee: 360.902.4111; governor.wa.gov

To Learn More

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



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 HUMAN A.I.D.
- 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

WHAT ABOUT THE 6 A-6'S THAT CRASHED IN
 ONE WEEK? ABOUT 1978, YOU ALL CALLED IT
 PILOT ~~THE~~ ERROR?
 W.I.F.?
 I BOUGHT [REDACTED] clam-shak
 IN 1964. TELL ME ABOUT IT.

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

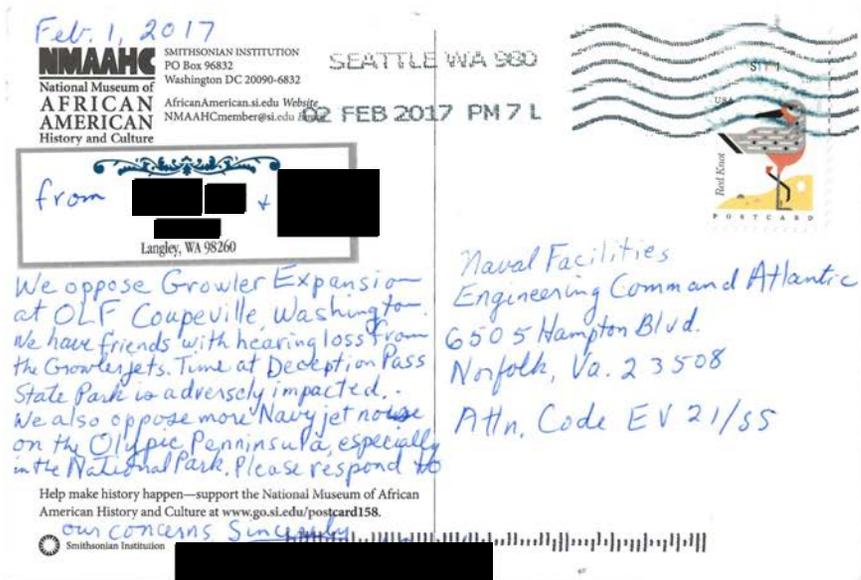
- 1.a. Thank You
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Langley, WA 98260

My husband and I strongly object to the Navy Growlers using the OLF in Coupeville because it is a too loud. We have several friends with hearing loss because of it. We have also been bothered by the jets flying over Deception Pass State Park--it makes camping & hiking there unpleasant. Children especially are sensitive to loud noises.

- 1.a. Thank You
- 12.n. Quality of Life
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.i. Deception Pass State Park and other State Parks

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



Langley, WA 98260

Noise from the Growler program is already causing serious harm to Whidbey Island and the proposal to add 36 more Growlers is disheartening. Information about this program has been extremely misleading including information on the Navy's impact on Island economy as well as numbers describing noise levels which only give averages. We all know it is the peak noises which cause the most harm in terms of impact on hearing and ability for children to function at school.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss

Victoria, British Columbia V8N 3B2

We hear the growlers quite loudly especially in the summer when we're out on our deck. When we're inside things rattle against our windows. I find it disconcerting and would rather not have more of these jets flying so near to us. If you could lessen the sound they make that would be much appreciated:-) Thank you!

1.a. Thank You

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

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.*

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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 Self
- 3. Address [REDACTED] Langley, WA 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

I am not a business owner, nor do I live near an airfield from which growlers will be deployed. However, I have grave concerns for the health & well being of my fellow citizens.

Of course our government must be concerned about national security. Of course citizens may be impacted in times of national emergency. My family contributed & endured hardship during WWII. However, the U.S. government (including the military) are empowered with defending life, liberty, & the pursuit of happiness for

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.a. Purpose and Need

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.

all of its citizens. Creating noise levels which we know will impact health, commerce, & environmental issues is not the proper work of our government.

For more information, please visit the project website at 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

Hello Navy folks, I am writing to encourage you NOT to expand the NAS combat capability by adding any GROWLER aircraft. I am concerned about the increased adverse environmental (air, water, land pollution, wildlife, Olympic National Park, Olympic National Forest), human (noise, enjoyment of quiet places in the National Park and National Forest, particularly designated wilderness areas), and cultural impacts on Native Americans. NO MORE GROWLER AIRPLANES.

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

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

Commander U.S. Fleet Forces Command
1562 Mitscher Avenue, Suite 250
Norfolk, VA 23551-2487

Jan. 13, 2017

Dear Naval Facilities Engineering Command,

I am writing to you to comment on the proposed expansion of Growler jets to the NAS Whidbey Island complex in Washington State.

The impact of jet noise on the communities is intolerable to the people living in the region. The noise has increased exponentially over recent years to the point that it wakes us from sleep and rattles our house. Additionally the wildlife habitat in Washington's extraordinary federal and state public lands, are also damaged by the disturbance caused by the jets flying near by. This is one of the last nature reserves of it's kind.

In Seattle there was an airfield on Lake Washington during World War II. It played a critical role at the time to support the war efforts, but as time moved on it was no longer an appropriate location for flight activities. The same scenario applies here. Washington's population in the Puget Sound region and the Olympic Peninsula can no longer support or tolerate noise from the loudest jet on the planet. The Growler is intended to intimidate and psychologically harm people, and it is not an appropriate jet to be flying in Western Washington.

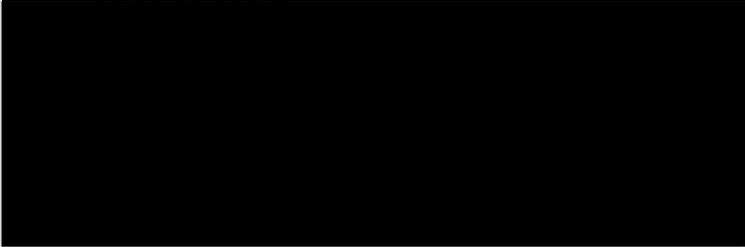
- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Additionally, the Draft Decision Notice Finding issued by the Forest Service on November 29, 2016 of No Significant Impact issued by District Ranger Millet is in error. In a separate correspondence I request the Forest Service withdraw the Draft Decision. The Forest Service failed to fully respond to the National Park Conservation Association's and others requests for more information. A copy of that correspondence is enclosed.

As a frequent visitor to Olympic National Park and also a resident of the San Juan Islands, I feel the Forest Service must comply with practices that protect the public's interest in Washington's forests. Those public lands will be negatively affected with extraordinarily loud jet noise during the expanded activities of the Pacific Northwest Electronic Warfare Range program. The Forest Service has not recognized the impact of noise on forest service land, wildlife habitat, the surrounding public lands, Olympic National Park and the local communities. The procedures established to engage, inform and disclose to the public were not fully implemented as required by law.

Thank you for your attention to these matters.

Sincerely yours,



Issues to Consider Raising in Objections to USFS Pacific Northwest Electronic Warfare Range Draft Decision Notice and Finding of No Significant Impact

Make sure any objection conforms to USFS regs re objections-36 CFR § 218.8.

Here's the guidance given by the Forest Service:

Minimum requirements of an objection are described at 36 CFR 218.8(d). An objection must include a description of those aspects of the proposed project/amendment addressed by the objection, including specific issues related to the proposed project/amendment; if applicable, how the objector believes the environmental analysis or draft decision specifically violates law, regulation, or policy; suggested remedies that would resolve the objection; supporting reasons for the reviewing officer to consider; and a statement that demonstrates the connection between prior specific written comments on the particular proposed project or amendment and the content of the objection, unless the objection concerns an issue that arose after the designated opportunities for comment.

Here are some issues we're finding:

--Missing documents and information-note any documents that you think you need to understand and properly object to the USFS Draft Decision (and its incorporated analysis)—cite 40 C.F.R. Sec. 1506.6(f). Examples: original draft decision from June 2014 is not on USFS website; current draft references an analysis regarding impacts on sensitive species that is not posted on USFS website; 1988 Master Agreement with Navy (which is posted) indicates Navy had to give USFS analysis regarding “unsuitability or unavailability of DoD lands” for these activities—analysis nowhere to be found.

--Object to splitting up NEPA analysis among so many different documents, USFS Draft Decision, Navy 2014 EA, Navy 2010 EIS, Navy 2015 EIS; confusing, no clear discussion of what analysis is found where. When incorporating analysis from other documents 40 CFR Sec. 1502.21 requires that USFS cite to specific analysis and describe it, which USFS does not do.

--Scope of analysis is too narrow. USFS draft decision improperly attempts to limit scope to impacts from mobile emitter trucks but at same time on page 1 admits mobile emitters are connected to Navy aircraft activities. USFS had to disclose and analyze all direct, indirect and cumulative impacts, and impacts from connected actions—that includes impacts from the aircraft that would be conducting training using mobile emitters.

--Scope of analysis also improperly completely ignores impacts to Olympic National Park (the “Park”). All maps used for analysis do not even bother to identify the Park or acknowledge that some emitter truck will be parked immediately adjacent to the Park and Navy aircraft will be flying over Park. Body of 2014 Navy EA does not

mention Park even once. Draft USFS decision only mentions Park once, p. 14, and incorrectly concludes no impacts to Park from USFS decision. Then it tries to incorporate other NEPA analysis of noise impacts from aircraft but does not indicate in any way what that analysis shows re impacts to the Park.

--Noise analysis from other NEPA docs (mostly Navy 2015 EIS) is flawed in many respects, is missing underlying data, and offers no basis for its conclusion that Navy aircraft noise would have only minor impacts on Park and its visitors. For instance, the noise analyses fail to adequately analyze baseline acoustic levels; USFS and Navy attempt to minimize acoustical impacts by assuming an incorrect baseline; they selective use different sound metrics to hide acoustical impacts; they require the public to parse the sound data in an attempt to understand the documents meaning; and they state their conclusions without providing the data underlying the analysis, deterring meaningful comment.

--Cumulative impacts analysis generally and re impacts to the Park is incomplete. The Draft Decision and FONSI never mentions the Park, and neither does the 2014 EIS. They fail to incorporate the cumulative impacts analysis from the 2015 EIS, and to the degree they do, it is deficient because it fails to properly account for impacts to Olympic National Park.

--USFS considers too few alternatives and does not consider alternatives that would have exercises conducted somewhere other than over the Olympic Peninsula and the Park. 1988 Master Agreement specifically required Navy to document that there were no DoD lands where these exercises could be conducted. That analysis is nowhere to be found.

--None of the NEPA analysis includes impacts from aircraft noise on USFS sensitive species. USFS only documents impacts from the emitter trucks and USFWS BiOp only examines impacts on ESA listed species.

--USFS FONSI does not contain the required convincing statement that USFS decision would not cause significant impacts. 40 CFR Sec. 1508.27. Contrary to what the USFS FONSI says, the impacts from Navy aircraft overflights will not be "localized" and will not be limited to the Project area on USFS lands. That is especially true in light of real and obvious impacts from Navy aircraft repeatedly overflying the Park and disrupting use of Park by visitors and native wildlife. 40 CFR Sec. 1508.27(3). These impacts alone require a complete, stand-alone EIS documenting impacts to the Park and its visitors.

Finally, the date we were told is the deadline for submitting comments is close of business on Friday, January 13. But consider submitting your comments the day before just to be sure.

[REDACTED]

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.f. Field Carrier Landing Practice Operation Totals
- 4.d. Day-Night Average Sound Level Metric



Camano Island, Wa 98282

December 9, 2016

SUBJECT: MEETING AT COUPEVILLE
NAS WHIDBEY MEETING REGARDING GROWLER ES REPORT

To whom it may concern:

I and my husband live on Camano Island. We moved there in 2014 in order to escape the airplane noise on Whidbey.

We researched the noise issue by attending EIS meetings at Whidbey over a 2 year period, consulted the noise zone maps and spoke to those who were conducting the meetings at Coupeville, mentioning to them we were going to move to Camano to avoid the airplane noise. We wrote two letters to the Navy regarding the issue and even mentioned to them we were moving to Camano to avoid the noise. Not one person responded that the noise over Camano was worse than on Whidbey.

We live at Rocky Point Heights and have a full view of the sound and Whidbey. I have been keeping records for two years regarding the frequency of flights over my house and down the sound. To sum up, without introducing specific data, jets fly over my house 22 times a day and never less than 10. They fly Monday thru Friday, less on Monday and Friday. In addition there is what I call the never ending "grumbling" which I have come to learn is from plane maintenance. The planes fly low and even when they fly high they accelerate to climb and this creates even more noise. The planes never fly over the portion of Whidbey that is across from Camano (Utsalady Bay), and they have basically ceased to fly "down" the sound toward Clinton. They never fly over Greenbank/Clinton area. The planes are almost always taking off over Camano, seldom landing, which makes the sound longer and louder.

When you notified us via newspaper article that plane noise would be louder over Camano and Oak Harbor due to construction and repair of airstrip it actually was cut in half. Since the notification the reduction in noise has remained constant.

I understand that Hawaii would not grant the Navy permission to extend their runways another 600 feet to accommodate the Growler so all maintenance and an additional 36 Growlers will be moving to Whidbey.

It is impossible to double the number of planes and keep the same noise zone maps, yet you are proposing this. There is no way to land or take off from Whidbey without creating unbearable noise for those living around Whidbey. It is my observation that you have shifted the noise to Camano because we have no government body to defend us, so I will be entertaining a law suit if the noise over Camano does not decrease.

P2
As
Re: 9th
Meeting
Coyne

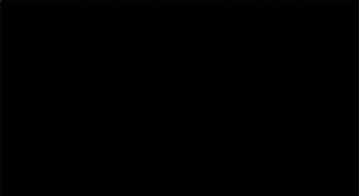
You are not observing our right to be notified regarding these meetings. Camano which is experiencing the most noise has no meeting scheduled here, no notification is made thru the Stanwood/Camano Newspaper so in my opinion you are in violation of the basics surrounding notification guaranteed in our constitution.

I am a para legal and have been studying the court papers regarding other suits that have been brought against you. You survive with your ridiculous noise calculation because your cases have not been heard by courts, but rather the FAA which is your close brother agency. The question is are your actions "Capricious". Going against current laws. I think I can prove they are. If a court would entertain your idea that you can average noise as you do, then a neighbor who is playing loud music (above 70 decibels) could use the defense that if averaged over a year's period it would not rise to the illegal noise level.

If you are flying over Camano unintentionally then please stop.

I would like to note that in the last three months I have observed you flying over Greenbank; over the portion of Whidbey adjacent to Camano and over Oak Harbor, but this is not representative of the flight patterns used in the last three years.

Thank you for your consideration



Clinton, WA 98236

These items are a major concern to surrounding areas. -Health effects from noise and low-frequency sound. -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.

- 1.a. Thank You
- 12.h. Tourism
- 12.j. Property Values
- 4.r. Nonauditory Health Effects
- 7.g. Ebey's Landing National Historical Reserve

Olga, WA 98279

1.a. Thank You

10.m. Impacts to Marine Species and Habitat

The critically endangered Southern Resident Killer Whales are in trouble. They number just 78 individuals at this point, more than 10% fewer than when they were listed on the endangered species list. And they continue to suffer from multiple threats, including lack of salmon (their preferred food), contamination from everyday chemicals that find their way into the food chain, the threat of an oil spill, and excessive noise that interferes with their communication and foraging. We need to do everything we can to help the orcas recover.

Clinton, WA 98236

Increases in Outlying Field (OLF) operations will significantly harm property values. This is not the 1960'S. The Island has significantly grown since I moved here in the 1980's. I have often been startled by prowlers while driving on the road going to OH. The noise is horrific. There are many issues not even addressed and those that have have been brushed aside by charts and bullet points favoring the Navy. The noise level daily would be horrible for those who live, work, farm, go to school or like enjoying wildlife outdoors in central Whidbey. Protecting our aquifer is also paramount and affects the whole Island and potentially everyone's health. Perhaps such a large Naval base is to impactful for Whidbey Island. Certainly now in the north west the large presence of Navy operations are affecting our marine and terrestrial wildlife as well as people. Another risk for our population is one of security with all the growler targets so close to, in reality, the whole Island in an attack. It is not that people are unpatriotic. It is more a realization that all the hype about keeping American safe is bogus. It is the people who promote our so called interests that have made the world unsafe. They are the ones making all the wealth and destroying the earth. The growler will not solve our problems. It just kills people on both sides. I for one want to see the smallest Navy footprint possible on Whidbey Island.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.a. Groundwater
- 12.j. Property Values
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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, 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

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:



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
- 2. Organization/Affiliation Unity Works
- 3. Address Port Townsend 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

I ask, in the name of the health, vitality, and peace of every person and creature in this region, PLEASE STOP ~~adding~~ Growler flights. I am OPPOSED to adding any more planes or flights to the existing program.

I have a 5 year old daughter who CANNOT SLEEP and is greatly disturbed by the noise of the planes. This increased Growler flight plan is NOT in the best interest of human beings. Thank you for considering our human right to a peaceful atmosphere.

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.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

Langley, WA 98260

This is a HUGE increase in proposed flying. I have a close friend whose well has been permanently destroyed by the chemicals involved. The following issues have NOT been adequately addressed: -water quality & aquifer contamination -noise impact on children/schools -natural resources impact -crash frequency -economic impact (tourism, property values)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.j. Property Values
- 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
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones

Sequim, WA 98382

In spite of the fact that the MOA's exist the EIS does not adequately address the impact on Marbled Murrelet and Northern Spotted Owl. The State of Washington DNR has gone to great expense to ensure the viability of these species. The State HCAP has removed much of the Trust Lands from logging to protect the habitat and the Beneficiaries in effect are sacrificing revenue to protect the species. EW training may effectively undo those efforts and cost the state even more. Every time a Growler or a mobile target vehicle comes in proximity with this protected habitat that should constitute a "taking" under the ESA and NEPA. Additional concern is the status of the area as a "Biosphere" and World Heritage Site designation by UNESCO. People travel from everywhere to visit, study and conduct research in these environs. Military operations are inconsistent with the values of these programs and the values of the people who live here on the North Olympic Peninsula. As a Navy Vet I understand the importance of training and preparedness and the hardship on our Warriors during deployment. Yes it would be less stressful a day to fly a sortie and be back by lunch or dinner but the cost to protecting the pristine back country and surrounding buffer zones is at odds with the goal of our National Security. These lands once disturbed will lose qualities which cannot simply be restored, as though cleaning a beach from an oil spill were equivalent. The casual observer may not note the changes but the diversity of species and ecological association will be harmed. I believe the Navy can best protect our Country and the best things about it without compromising the forests of the Olympic Peninsula. These lands are among the last where one can travel on foot and back in time where as Gordon Lightfoot sang "The dark green forests were so silent to be real". Please consider what that means for all those who come here to seek that experience and how your decision can help keep it that way. Thank You,

██████████

1.a. Thank You

10.a. Biological Resources Study Area

10.f. Endangered Species Impact Analysis Adequacy

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

7.d. Recreation and Wilderness Analysis and Study Area

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

January, 2017 Comments

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EA-18G EIS Project Manager
NAVFAC Atlantic Attn: Code EV21/SS
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- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

- 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
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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

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

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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:

POINTS 1-6 (OTHER SIDE) PREVENT ACCURATE ASSESSMENT
OF THE IMPACT ON HEARING AND EDUCATION WHEN
CHILDREN ARE EXPOSED TO GROWLER NOISE.

ACTION: ASSESS IMPACTS FOR CHILDREN USING APPROPRIATE
AND UPDATED MEASUREMENT PROCEDURES & ANALYSIS.

1.a. Thank You

oak harbor , WA 98277

The OLF is fairly remote, and the residents knew about it before they bought or rented.
How about a little patriotism !

Freeland, WA 98249

While I understand that the Navy is an important part of the Whidbey community I think that the opposed expansion of the Growler fleet will have a negative impact on other equally important parts of our community. Schools, parks, tourism activities and wildlife are only a few of the things that will be affected. Why should the Navy expand in a way that hurts other essential aspects of our lives? This is a populated, suburban area in a country with a great deal of open space. Surely there is a better solution!

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

Anacortes, WA 98029

- 1.a. Thank You
- 10.m. Impacts to Marine Species and Habitat
- 12.j. Property Values

I hope that we can reach a compromise. If you fly every night, I can write of the value of my house as can everyone. It will also severely affect the wildlife, like the otters that are in Shipharbor.

Seattle, WA 98101

As an avid outdoorswoman who frequents the Washington coast for both pleasure and work, I'd like to object to the expansion of growler use over the Olympic National Park and Forest. I have personally experienced jet noise while doing fieldwork for the Seattle Aquarium, and can report that the jet noise has quite an impact on the wildlife. While assisting with the annual sea otter survey, we experienced such a loud jet produced noise that we lost sight of the entire raft of otters. They scattered and dove, which disrupts the group dynamic and may cause additional stress to the animals (especially young pups and mothers). In addition, all harbor seals that were resting within sight also dove into the water, and a large flock of birds resting on one of the outer islands in Giant's Graveyard also quickly flew away. I'd like to suggest that the expansion occur in another area than the Olympic Coast National Marine Sanctuary, and to respect this protected area and the wildlife within.

1.a. Thank You

10.a. Biological Resources Study Area

10.b. Biological Resources Impacts

10.c. Wildlife Sensory Disturbance and Habituation

10.m. Impacts to Marine Species and Habitat

2.n. Alternatives Considered But Eliminated

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

LOPEZ ISLAND, WA 98261

1.a. Thank You

4.r. Nonauditory Health Effects

The Draft EIS dismisses long-term health impacts of jet noise because some studies are not conclusive. I request that health impacts of Growler noise on health should be based on findings documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."

Lopez, WA 98261

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

The Draft EIS includes some independent noise measurements but ignores significant efforts undertaken by other entities. I request that the EIS must be redone to incorporate Coupeville noise measurements performed by JGL Acoustics and San Juan County noise reports.

LOPEZ ISLAND, WA 98261

1.a. Thank You

7.h. San Juan Islands National Monument

The DEIS suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. This is NEPA protection was granted prior to the establishment of the SJI National Monument. I request that the Navy revise the EIS to evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.

LOPEZ ISLAND, WA 98261

Analysis of noise impacts from Growlers in the DEIS is based solely on computer simulation. To be valid for decision making, models must be verified. I request the Navy calibrate the computer model with actual noise measurements in locations throughout the region. In addition, transparently 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.

1.a. Thank You

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

Lopez Island, WA 98261

The NOISEMAP computer model used in the DEIS was found in a Department of Defense report to be outdated. The DOD determined that new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers. This new software exists. It should be used. I request the Navy redo the noise simulation using the more recent Advanced Acoustic Model (AAM).

1.a. Thank You

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

Lopez Island, WA 98261

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 intense military flight activity of the Growler. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. It's like claiming that visiting a rifle range without hearing protection has low impact because actual time at the range is small a small fraction compared to the number of hours in a year. I request that analysis should be based on average and peak noise levels while the Growlers are overhead, or at the very least averaging over active flying days.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

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

December 5, 2016

Re: Comments on the "Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex"

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

Dear EIS Project Manager,

Thank you for the opportunity to comment. Having reviewed the draft Environmental Impact Statement (EIS) prepared by and for the Navy, I have the following concerns, comments and questions.

1. Use of outdated and flawed noise simulation model

Aircraft noise levels represented in this draft EIS are "generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville" (page 3-16). The computer modeling program used for this EIS is "NOISEMAP Version 7.2 (October 29, 2015), developed by Wyle Laboratories.... The U.S. Department of Defense (DOD) uses NOISEMAP as the accepted standard noise modeling program for assessing potential noise exposure from fixed-wing aircraft NOISEMAP is routinely updated and validated through extensive study (Lundberg, 1991; Speakman, 1989; Lee, 1982; Seidman and Bennett, 1981; Rentz and Seidman, 1980; Bishop et al., 1977; and Dundoradale, Horonjeff, and Mills, 1976) to provide the best possible noise modeling results for these applications."¹

Firstly, the date "October 29, 2015" in parenthesis after NOISEMAP Version 7.2 is misleading. What does the date refer to? When was NOISEMAP Version 7.2 first released? In my quick research, NOISEMAP Version 7.2 was used in a study completed in August 2004.² This evidence suggested that version 7.2 is at least 12 years old. Based on the latest "routine updates" cited above (Lundberg 1991) in the draft EIS, the last update may have been in 1991, over 25 years ago?

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.³ The 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

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 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
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.j. Other Reports
- 4.t. Noise Mitigation

¹ Draft EIS, p. 3-16.

² Wyle Laboratories, *Aircraft Noise Study for Naval Air Station Joint Reserve Base Fort Worth Fort Worth, Texas*, August 2004, p. 1-3. Accessed on 12/3/2016 from <http://www.nctcog.org/trans/aviation/ilus/noisestudy04.pdf>

³ SERPD, "Advanced Acoustic Model Technical Reference and User Manual" Project WP-1304, August 2010. Accessed on 12/3/2014 from <https://www.serdp-estcp.org/content/download/9133/109364/file/WP-1304-TR.pdf>

operations.”⁴ 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 2010.⁵ 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.”

In other words, higher velocity jet exhaust (from higher thrust aircraft like Growlers) produce more non-linear turbulence and greater sound intensities than older, less powerful aircraft. The fact that NOISEMAP was based on linear acoustics means that it does not properly simulate the non-linear sound dynamics characteristic of the Growlers. In addition, NOISEMAP can only model one or more aircraft as an “integrated” monolith object. So it does a poor job of modeling complex flight operations where multiple aircrafts fly simultaneously in different patterns. AAM, on the other hand, does include the effects of nonlinear sound propagation, as well as terrain, weather and other features, resulting in time simulation that produces more physical realism and detail than NOISEMAP. Also, AAM allows each aircraft to be modeled separately as a 3D noise source and produce composite results of these individual units.

Given the existence of newer computer models with superior capabilities and more accurate noise assessment like AAM since 2010, why did the Navy use the flawed and dated NOISEMAP as the modeling tool for this draft EIS? The unfortunate choice of NOISEMAP has thus rendered the noise analysis in the entire draft EIS scientifically inaccurate and potentially legally indefensible with respect to the requirements of the National Environmental Policy Act of 1969 (NEPA).

Recommendation: All the noise assessments in the draft EIS should be redone using a more accurate noise simulation model such as AAM.

2. Lack of noise data (transparency)

Even if the choice of noise simulation model were scientifically and legally defensible, the quality of data used as inputs into the model would still be questionable.

First, it is unclear what kind of noise data were used as a basis for noise assessment calculations in the noise simulation program (NOISEMAP). The draft EIS states on page 3-16 that aircraft noise levels represented in this draft EIS are “generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville.” But has there ever been any actual noise measurements of a Growler anywhere? If not, what types of aircraft were used as proxies and how

⁴ <https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>

⁵ Ibid.

are they different than a Growler? If so, when and where were the noise measurements taken? By whom? What were the positions of the microphones? Under what operating conditions? The 716-page draft EIS Volume I inadequately describes the specifics of the noise measurement data used as a basis for the noise exposure modeling. Without this information, readers have little basis upon which to judge the validity and relevance of the data and noise assessments. The only mention found was that the computer model draws from "a library of actual noise measurements" (page 4-20) with no details provided.

On page 24 of Appendix A in Volume II of the draft EIS, the reader is informed that the only data inputs into the NOISEMAP model were "the data described in Sections 4.1 through 4.3." However, sections 4.1 through 4.3 contain no noise data, only the number and types of flight operations, runway and flight track patterns, and frequency and durations of maintenance "run-ups".

This means that NOISEMAP is treated by the draft EIS as a "black box". Flight operational data and other pertinent non-sound data are the only transparent inputs into the NOISEMAP model. The entire 1,500 pages of the two-volume draft EIS has nothing to offer to the readers regarding the quality of the aircraft jet noise measurement data used by NOISEMAP to simulate Growlers' jet noise impacts. This lack of data transparency makes it difficult to assess the credibility of the noise exposure simulation in the draft EIS. If the Navy is confident about the quality and scientific rigor of the noise data it used to do the sound exposure modeling, it should transparently share this information. Otherwise, we cannot trust the black box simulation-based noise assessments in the draft EIS. The onus is on the Navy to prove that the existing data are of good enough quality to justify the lack of taking actual near-field and far-field noise measurements on site.

In addition, several communities have done actual far-field measurements and provided the data to the Navy to be included in the noise assessment. It is unclear if and why the draft EIS did not include these noise measurement data.

Recommendations: The draft EIS must provide details of assumptions and noise measurement data used or not used in noise simulation. Details should include types of aircraft, time and place of measurements, positions of microphones, aircraft operational conditions during measurements, etc. It should also take the community measurement data into consideration and compare and contrast different sources of data.

3. Need for actual noise measurement data

Once the details of noise measurement data are provided, the public and affected communities should have the opportunity to determine whether or not "the library of noise measurement data" the computer model draws from is scientifically adequate as a basis for all calculations to evaluate noise impacts. If not, the Navy needs to conduct actual near-field and far-field noise measurements of Growlers under varying operation conditions on site and nearby.

Though objectionable, the fact that the draft EIS did not provide data transparency on jet noise was not surprising. In April 2009, the blue ribbon Naval Research Advisory Committee (NRAC) panel on jet engine noise reduction found that "[t]here has never been a requirement for engine noise in the design of engines for tactical jet aircraft, nor does the Navy measure or maintain an engine noise data base for tactical aircraft. The Air Force does maintain the only known acoustic database which includes both tactical and transport aircraft, including many Navy aircraft. This database has flyover measurements and some near-field measurements from engine run-ups. There have not been Navy

requirements for similar measurements other than providing an environmental impact statement for the surrounding community.”⁶

The NRAC went on to recommend that while “[t]here are currently standards for outdoor far-field noise measurements established by the American Society for Testing and Materials and the American National Standards Institute which are applicable to commercial type aircraft, [s]tandards must be established for acquiring near-field, far-field ground run-up, and flyover noise for tactical jet aircraft. Tactical jet aircraft can have higher noise directivity variations that existing far-field measurement standards for commercial aircraft do not address, and there are no standards for acquiring near-field aircraft noise data. Methods for quantifying near-field, high-amplitude sound levels for sources that vary in time and space will need to be defined. Emphasis should be given on developing methods to enable valid comparisons of noise levels among aircraft.”⁷

In sum, NRAC’s findings highlighted the Navy’s lack of jet noise data measurements, lack of consistent measurement methodology and standards, and lack of jet noise database and its proper maintenance. NRAC’s insightful assessments and sensible recommendations were made to the Navy since April 2009. If the Navy has not acted on the NRAC’s recommendations, it could start now with taking proper Growler noise measurements as a key input into preparing a scientifically and legally defensible draft EIS.

Recommendations: The Navy should identify consistent methodology for jet noise measurements and conduct proper measurements for the purpose of completing the draft EIS. The Navy should incorporate in its practices the other recommendations put forward by NRAC to reduce jet noise from its tactical aircraft.

4. Inclusion of operational strategies for jet noise reduction

In addition to the recommendations mentioned above, NRAC in the same study⁸ offered many other useful strategies for the Navy to reduce jet noise from Growlers and other aircraft, including:

- Commercial aircraft use a procedure called “cutback” in which engines are throttled back just after takeoff. The aircraft then climbs at a slower rate until away from the airport community and then resumes a higher climb rate. This procedure is perhaps the most promising and practical for reducing noise near military air fields because it does not require changes to the aircraft – and can reduce jet noise by 10 dB or more.
- Eliminating afterburner during takeoff will also provide a significant noise reduction benefit. Afterburners increase the jet noise levels by 5 to 10 dB above military power.
- Retrofit all F/A-18 F-414 engines with chevrons on the exhaust nozzles to reduce noise by 3 dB.
- The Navy should have a policy to systematically measure or maintain an engine noise data base for all tactical aircraft.

⁶ Naval Research Advisory Committee (NRAC), *Report on Jet Engine Noise Reduction*, April 2009. Accessed on 12/3/2016 from <https://ntrs.nasa.gov/archive/nasa/casi.ntrs.nasa.gov/20020024448.pdf>

⁷ Ibid.

⁸ Ibid.

In addition, NAVFAC (Naval Facilities Engineering Command) in its June 2009 study has found that Noise Attenuating Device (NAD) could reduce pollution emissions from both particulates and NOx as well as reduce jet engine noise by more than 20 dB. NAD fabrication also costs only 6% of a typical "hush house" installation, making it very cost-effective.⁹ Noise mitigation measures should certainly include NAD for Growlers.

Additional long-term measures relating to the design and procurement of tactical jet aircraft are discussed as an appendix to this letter.

Recommendations: The draft EIS incorporate the operational strategies for effective jet noise reduction as recommended by the NRAC and NAVFAC, as discussed above.

5. More complete and accessible presentation of noise assessment results

The noise metrics used in this draft EIS to present the results of the NOISEMAP modeling are Day-night Average Sound Level (DNL), Equivalent Sound Level (Leq), sound exposure level (SEL), maximum A-weighted sound level (Lmax) and Number of Events above a Threshold Level. These metrics are helpful but incomplete and insufficient. There are other metrics that, if included, would provide a more complete picture of noise exposures. These include C-weighted Sound Exposure Level, Effective Perceived Noise Level (see sample below), and Weighted Equivalent Continuous Perceived Noise Level.

Comparing the Extreme Noise of a Military Jet to a Human Conversation

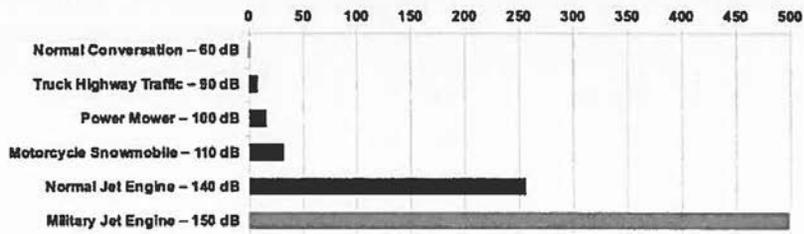


Figure 1 The scale of the bar graph in this figure is based on perceived noise level.

These metrics are part of the featured outputs of the Advanced Acoustic Model (updated version of NOISEMAP) and can be easily created by the program. To make the noise metrics more easily understood by laypeople, the program also provides options of presenting the modeling results in graphical formats that are visual and accessible, such as noise contour animation video (see a sample snapshot below).

⁹ NAVFAC 2009, *Reduction of Noise from the J052 and F-404 Jet Engines During Static Testing Using the Noise Attenuation Device (NAD)*. Accessed on 12/3/2016 from <http://www.dtic.mil/cgi-bin/GetTRDoc?AD=ADA527661>

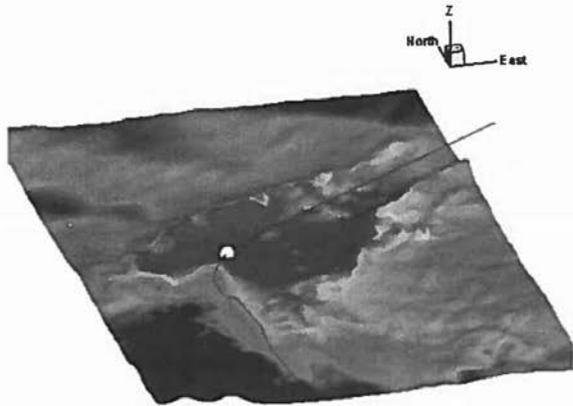


Figure 3-9. Ground Noise at a Single Time in a Video Animation

In addition, it is very important that the public and affected community members know and understand the profile of sound levels across the different frequency spectrums. Different frequency sounds or vibration have different impacts, health or otherwise. The two figures below show equivalent sound levels of different frequency sounds. The results are based on sound measurements from a test of a F404 jet engines used in fighter jets "Hornets".¹⁰ As seen in the following two graphs (red bars for unattenuated sound, from positions 90 feet and 2 miles away respectively), high thrust engines not only have audible noise impacts but also inaudible low-frequency "windows rattling" pressure waves.

Notice how the inaudible (below 20 Hz) frequencies may be even "louder" if the graph the continued to the left. It is also worth noting that lower frequency sound waves travel through air much better higher frequency ones (see Figure 4.14). If this kind of detailed visual presentation of noise profile from Growler operations would be very helpful for readers to have a more complete understanding of the noise impacts. It is important that the Navy provide a similar set of frequency spectrum sound levels for Growlers as shown in Figures 4.13 and 4.14 below, but with even wider range for low frequency sound waves. Because F414 engines used in Growlers have about 35% more thrust than F404 engines, the noise impacts, near-field and far-field, are likely to be more pronounced, particularly in the low frequency region?

¹⁰ NAVFAC 2009, *Reduction of Noise from the J052 and F-404 Jet Engines During Static Testing Using the Noise Attenuation Device (NAD)*. Accessed on 12/3/2016 from <http://www.dtic.mil/cgi-bin/GetTRDoc?AD=ADA527661>

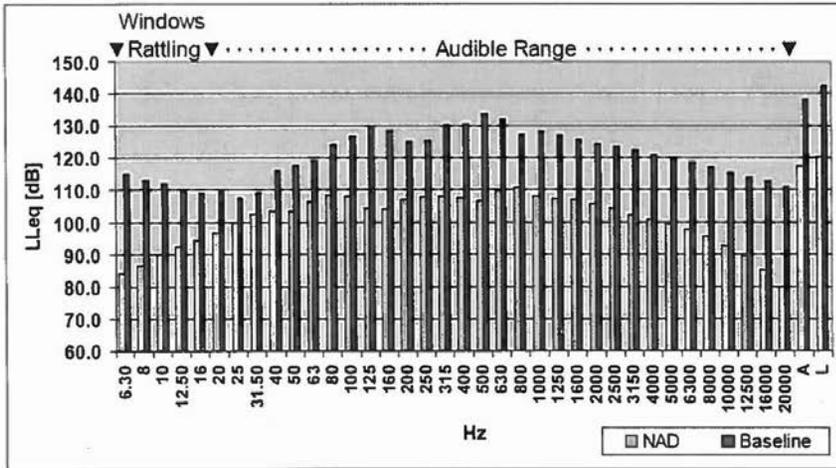


Figure 4.13 Near-Field Noise Reductions with NAD and F-404 Engine @ afterburner at a distance of 90 feet.

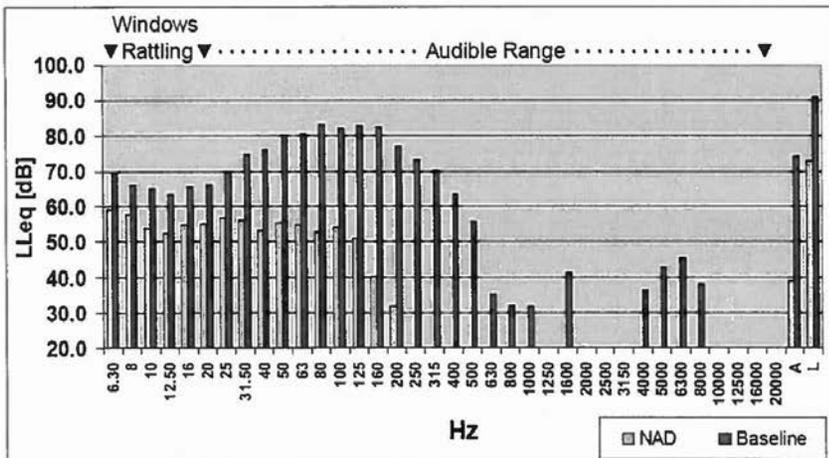


Figure 4.14 Far-Field Noise Reductions with NAD and F-404 Engine @ afterburner & 2 miles.

Recommendations: The draft EIS should include a more comprehensive list of sound metrics (including frequency spectral distribution of sound levels that cover inaudible low-frequency range, and C-weighted Sound Exposure Levels) and present them in more visual and easily accessible formats.

6. Ongoing noise monitoring and reports

In Australia, the Department of Defense has an ongoing sound monitoring and noise report programs as an added measure of accountability to ensure that the actual noise from flight

operations do not exceed the levels predicted in the Public Environment Report (the Australian equivalent of EIS).¹¹

This is a best practice that the Whidbey NAS could consider incorporating in the EIS and as an ongoing measure if the proposed action is approved.

Recommendations: Incorporate an ongoing noise monitoring and annual Growler noise reports as seen in the Australian example.

7. Page number of the draft EIS report

One of the laws and regulations this draft EIS is supposed to comply with is CEQ Regulations for Implementing NEPA (40 Code of Federal Regulations [CFR] parts 1500-1508). Section 1502.7 of CEQ Regulations on page limits states that “The text of final environmental impact statements...shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages.”

This draft EIS comprises two volumes each over 700 pages. Yet, it fails to provide essential information such as the noise measurement data, as discussed above. Was the EIS written in such a lengthy format in order to obscure the lack of essential data? To be in compliance with pertinent laws and regulations, the final EIS needs to be more substantial yet significantly more succinct. Because the draft EIS is significantly out of compliance with CEQ Regulations on page limits, the Navy should, at the very least, allow more time for citizens to review and comment on the EIS.

Recommendations: The Navy should allow more time for citizens and affected community members to review and comment on the 1,500-page draft EIS. In revising the draft EIS, the Navy should be significantly more succinct to be in compliance with Section 1502.7 of CEQ Regulations for Implementing NEPA.

In conclusion, the draft EIS is incomplete and has such serious analytical deficiencies—including the usage of flawed, outdated NOISEMAP as the main modeling tool to produce all noise exposure assessments, the lack of transparency around “the library of noise data” from which the NOISEMAP model draws, and the lack of empirical noise measurements of Growler operations—that the noise assessment results are found to be untrustworthy. Such questionable noise exposure results preclude any meaningful review of consequent noise impacts. To achieve compliance with NEPA and other relevant laws, the Navy will need to redo the noise assessment analysis using an improved, updated model like AAM and possibly making necessary empirical noise measurements of Growler operations. Otherwise, the noise exposure and impact analyses are unlikely to be scientifically or legally defensible.

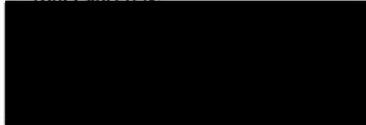
CEQ Regulation 1502.9 (a) states that “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.” In light of such inadequacies of this draft EIS as discussed above and the need for a significant revision, the Navy must issue a revised draft EIS, at least for the portions pertaining noise impacts, to be compliant. Only after a properly revised EIS is issued can citizens and affected

¹¹ See the 2014 Annual Super Hornet Noise Report for example at <http://www.defence.gov.au/AirCraftNoise/Master/Docs/Environment/2015-11-26%20-%20ASH%20Noise%20Report%202014.pdf>

community members meaningfully review and comment on the Navy's analysis of noise impacts resulting from the proposed action and alternatives of adding 35 to 36 Growlers.

Thank you for your consideration and action on my questions, comments and recommendations.

Yours sincerely,

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

Lopez Island, WA 98261

Enclosure Appendix: Long-term strategies for noise reduction

Appendix: Long-term strategies for noise reduction

Beyond the scope of this EIS and Growler operations at Whidbey NAS are issues that the Navy should address in the procurement process for tactical jets for successful long-term reduction in noise. The following recommendations by the NRAC warrant special attention:

- There should be a requirement for engine noise in the design of engines for tactical jet aircraft.
- The development and application of high fidelity prediction tools is critical to the understanding of jet noise source mechanisms and the ability to evaluate noise reduction concepts. This is deemed to be an essential step to reducing jet engine noise beyond 3-5 dB.
- The propulsion community (i.e., government, industry and academia) agree that in order to achieve significant reductions in tactical jet engine noise, a path similar to that followed by commercial aviation must be followed. This involves the airframe prime contractor (e.g. Boeing) having the responsibility for the noise signature of the airplane. Today the engine is developed and procured as government furnished equipment (GFE) to the airframe prime contractor. As a result the airframe prime contractor does not have total system design responsibility. How the engine is integrated into the airframe can have a big impact on the total noise signature of the aircraft. The DOD strategy has been to separately specify and contract for the performance and signature requirements of the aircraft and its propulsion system. This acquisition strategy leaves no one company responsible for successfully meeting the full system of systems requirements.
- Unfortunately, acoustic signatures have not been critical performance parameters in military tactical aircraft system development programs. For future aircraft programs, concern should be paid to acoustic signature effects on the hearing of Navy Sailors and Marines as well as the environmental effects on the local air base communities. The Navy must rethink how to incorporate lower noise signatures into a full system parameter requirement. This new contracting strategy will allow the prime contractor, in concert with the propulsion system contractor, to initially tradeoff the contributions of the various signature elements with the normal system performance elements (e.g., speed, range, and maneuver) and perform a system level optimization taking all elements into consideration. Without integrating all performance and signatures together, there cannot be a system of systems optimization. In order to make significant reductions in aircraft noise, aircraft system contracts need to specify a noise requirement. This can be done by establishing noise as a Key Performance Parameter (KPP) and incentivizing the prime contractor and the propulsion system subcontractor to develop designs which meet this KPP.

Though NRAC's recommendations in 2009 were not yet implemented, it is not too late for the Navy to start now. The draft EIS mentioned more than once that "it is Commanding Officer, NAS Whidbey Island policy to conduct required training and operational flights with as minimal impact as possible, including noise, on surrounding communities." Such a successful long-term implementation of the said policy, it is essential that the Navy take into serious consideration and act upon the recommended strategies for reduction jet noise impacts on its own personnel and surrounding communities.



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

2. Organization/Affiliation

3. Address Lopez Island, WA 98261

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

Lopez school is a K-12 school with 200 students located in the center of the island (corner of school road and Center Rd). Your attention to avoiding overflights in this area will reduce disruption to our children's ability to study.

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



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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

It is remarkable that this EIS was conducted with apparently no actual ground measurements of noise from current levels of operations. Computer modeling without calibrating to actual measurements is inadequate and leaves the Navy very vulnerable to future lawsuits.

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

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Greenhouse gas emissions The greenhouse gas (GHG) emission calculations in the EIS have a variety of errors and substantially under-report CO₂e emissions. Issue #1: failing to account for significant flying that happens between “takeoff” and “landing” The calculations of GHGs include separate calculations for take-offs (Departures), Interfacility Departures, Straight in Arrivals, Overhead Break Arrivals, IFR Arrivals, Interfacility Arrivals, Field Carrier Landing Practice (FCLP) , Touch & Go Ops, Depart-Re-enter Ops, and Ground Control Approach (GCA) pattern Ops. The furthest flight distance any of these operations appears to cover is the GCA pattern Ops, which are described in the EIS as a straight-in arrival in which “the aircraft generally descends on a 3-degree glide slope through 3,000 feet AGL, 10 miles from the runway” (section 3.2.4.1). None of these describe the much wider flight tracks shown in figure 3.1-3 (page 3-8), not to mention that fact that Growler jets are routinely observed directly overhead more than 5 miles outside of the furthest of these tracks. What about the fuel consumption flying these paths which can have a diameters that (sometimes substantially) exceed 30 miles? To put it simply, there should be another category that captures these larger flight paths that Growlers often take between takeoff and landing that is not in listed in the operations for which greenhouse gas emissions are calculated. Issue #2: Fully accounting for afterburner use? The EIS has modified the duration of afterburner usage during takeoff from 30 seconds (as found "Straight-In Arrival LTO," "Break Arrival LTO" for F414-GE-400 Engines for operations at NAS Whidbey Island based on Table S-1, AESO Memorandum Report No. 9815, Rev H, November, 2015) to 20 seconds following an email from CDR Sean Michaels, May 12, 2016). What is the basis for the reduction in after burner usage? This is inconsistent with available all youtube videos of Growlers taking off with afterburners from ground-based runways that clearly indicate afterburner burn of more than 20 seconds. <https://www.youtube.com/watch?v=wG-JO9-3OeA> <https://www.youtube.com/watch?v=HZhlfGhIjK> Issue #3: Fuel usage figures in EIS nearly five times lower than implied by Selected Acquisition Report (SAR) Greenhouse gas emissions increases for additional Growlers is largely determined by estimates of annual fuel consumption by the aircraft. The EIS estimates “no action” annual Growler fuel consumption at 9,517,164 gallons in 2015 (EIS vol 2, Appendix B, “No Action Average Year Air Emissions NAS Whidbey Island Complex” page B-9) for existing 82 Growlers (including maintenance run-ups such as engine tests and water washes). - On average, this works out to 116,063 gallons of jet fuel per Growler per year. In the Defense Acquisition Management Information Retrieval (DAMIR) 2013 “Selected Acquisition Report (SAR) RCS: EA-18G Growler Aircraft (EA-18G),” EA18-G Growler fuel consumption for deployment at Whidbey Island Naval Air Station is listed as 1,304 per hour with an average flight hours per aircraft of per month of 34.2 (see page 35), or 410.4 hours per year. 1,304 gallons per hour multiplied by 410.4 hours per year is 535,161 gallons of jetfuel per Growler per year. What explains the greater than 4.6 fold difference (535,161 divided by 116,063) between annual per-Growler fuel use for budget purposes (in the Selected Acquisition Report) vs. the annual per-Growler fuel use in the EIS? As tax payers and as citizens concerned about the climate impact of these aircraft, which Navy figures are we to believe? Issue #4: EIS emissions should be validated with actual historic Growler fuel consumption The approach of breaking up flight ops into component

1.a. Thank You

18.a. Climate Change and Greenhouse Gases

18.b. Average Carbon Dioxide per Aircraft

18.d. Washington State Greenhouse Gas Goals

parts and estimating the fuel consumption and GHG emissions for each should be validated with an accounting of the actual fuel consumption used by Growlers at Whidbey NAS for the most recent year on record. This is especially important given the vast (4.6-fold) difference between annual fuel consumption exhibited between data in the EIS vs. the 2013 Selected Acquisition Report (issue #3 in these comments) as well as the apparent omission of significant amounts of flying (issue #1 in these comments). Chris Greacen filed a Freedom of Information Act request on 8 December, 2016 for this information but has received no response. Issue #5: EIS may therefor mis-state increase in GHG emissions The EIS states that "The increase in greenhouse gas (GHG) emissions from the Proposed Action equates to less than 1 percent of all aircraft GHG emissions in Washington. Therefore, the GHG emissions from the Proposed Action should not have a significant impact on Washington's GHG emission goals." First of all, the assertion that an increase of "less than 1 percent of all aircraft GHG emissions in Washington" is "not a significant impact on Washington's GHG emissions goals" is inaccurate. The Alternative 1-A's calculated emissions increase of 161,302.7 metric tonnes per year is more than ten times higher than the greenhouse gas emissions associated with producing all electricity consumed in San Juan County (15561 metric tonnes annually) (based on 141,467 MWh sold and emissions factor of Washington state electricity of 110 kg of CO2 per MWh -- <http://www.opalco.com/about/> and <http://www.eia.gov/electricity/state/washington/>). Second of all, the increase in emissions that this "less than 1%" estimate is based on are very questionable, as discussed in issues #1 through #5 above. Issue #6: the Navy should commit to mitigation measures to reduce GHG emissions One potential measure identified in the DEIS is MAGIC CARPET (automating parts of carrier landing which will reduce FCLP training activity). An alternative not considered in the DEIS is to deploy Unmanned Carrier-Launched Airborne Surveillance and Strike (UCLASS) jets instead of additional Growlers. The smaller UCLASS vehicle is lighter, has only one engine and uses less fuel, reducing costs and CO2 emissions and, as it is unmanned, has no need to practice.

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Impacts on children and schools is inadequately covered The EIS states, "Based on the limited scientific literature available, there is no proven positive correlation between noise-related events and physiological changes in children." This ignores the correlation between noise-related events and psychological (or other) changes in children. The EIS should take into consideration published findings on the impact of intermittent noise on child development including psychological changes. I have two children that attend Lopez Island School, which is regularly under the flightpath of Growlers. The EIS states, "There are no schools located within the APZs at Ault Field and OLF Coupeville under any of the alternatives or scenarios; therefore, there is no disproportionate environmental health and safety risk to children as a result of possible aircraft mishaps." This ignores the possibility of aircraft mishaps and impacts from normal aircraft operations that occur outside of APZs. APZs are areas of higher risk of accidents, but this does not mean that areas outside the APZ are risk-free. Growler jets routinely fly directly over Lopez Island School. The EIS should take into consideration the probability and risks associated with a growler crashing at or near schools, school bus, or other areas where children congregate. Such analysis would need to take into account the Navy's use of fire-arresting chemicals and their impact on health and safety of communities including impacts to ground-water. The EIS should also consider the health impacts on children from combustion products from jet fuel from flyovers above the school. Use of day-night average sound levels is misleading and inaccurate metric of impacts Use of day-night average sound levels (DNL) as a metric is inadequate as it dilutes the impacts of high intensity, shorter duration noise events. If someone discharged a shotgun near your unprotected ears it would have impact on hearing. But the high pulse of sound lasting a tenth of a second would have virtually no impact on a day-night average sound level which averages the loud tenth of a second together with 864,000 quieter tenths-of-seconds in a day. For the same reason, a short duration but extremely loud event like a growler fly-over is not captured by diluting this sound across all minutes in a day. The EIS be redone with greater consideration peak decibels. Impact on wilderness areas The EIS states that "There are no wilderness areas within the study area, and therefore there would be no impact on them." This statement is incorrect and it appears to imply that "wilderness" only exists within "officially designated National Wilderness Areas". Wilderness abounds in San Juan and Island Counties, indicated, among other things, by the fact that the 2015 National Monument status was bestowed on thousands of acres throughout the San Juans. The Bureau of Land Management (BLM) has determined that BLM-owned and controlled lands in the San Juan Islands National Monument possess wilderness characteristics (i.e., "possess naturalness and outstanding opportunities for solitude or primitive and unconfined recreation"). The San Juan National Monument covers significant acreage that is directly under the flight path of Growlers, particularly the lands on the south end of Lopez Island. An improved EIS should considering impacts on the San Juan National Monument, and designated marine wildlife sanctuaries in the region. Findings of No Significant Impact (FONSI)s for previous expansions and modifications of the NAS Fleet do not reflect reality and should in no way be used to justify findings in the current EIS A Finding of No Significant Impact (FONSI) was signed on July 19, 2005 for the transition from Prowler to Growler aircraft and a separate FONSI was issued for a 2012 EA that considered

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 17.a. Hazardous Materials and Waste Impacts
- 4.d. Day-Night Average Sound Level Metric
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.k. Comparison of the Prowler to the Growler
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 7.f. Impacts to Wilderness Areas

transitioning the expeditionary Electronic Attack squadrons at NAS Whidbey Island from the aging Prowler to the newer Growler. These findings are contrary to the experiences of residents in the area who report much louder noise events and who have gone to the trouble to register over 6000 complaints on the San Juan County noise website where there were very few noise complaints prior to 2005. Clearly 6000 complaints is not consistent with "no significant impact". With over 10 years of hindsight, the 2005 and 2012 FONSI appear to represent willful cases of burying the fact that Growlers are significantly louder than Prowlers. In light of this, the inappropriately granted FONSI of July 2005 and 2012 should be taken into consideration when considering this EIS and any Findings associated with the present EIS. Average Busy Day (ABD) vs. Average Annual Day (AAD) metric On pages 3-12 and 3-13 the EIS dismisses use of the Average Busy Day (ABD) metric, in favor of the Average Annual Day (AAD) metric with vague qualitative discussion that favors averaging activity over an entire year. Concerns raised by the public are not limited to average increases. The public is concerned with the increase in frequency of the window-shaking, conversation stopping, hearing-loss inducing loud Growler flyovers. In this regard, it is the above-average flights and above-average busy days that have disproportionate impact on the public. The EIS dismissal of ABD appears to largely boil down to the fact that the Navy is concerned it would "overstate" noise impacts. But its use of the word "overstate" is rooted in an assumption that the impacts are appropriately measured in annual averages rather than other metrics that capture the frequency and duration of disturbing events and the impact of those events on the communities below the jets. The EIS should include parallel quantitative analyses using (impacted public-preferred) ABD and the (Navy-preferred) AAD.

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1. According to the Navy, "The Growler is recognizable by the low frequency "rumble" of its jet engines." Nevertheless, low frequency noise impacts are ignored in the Draft EIS. Section 3.2 - Noise Associated with Aircraft Operations - makes no mention of the signature low frequency noise of the Growler. All of the noise analysis is based on A-weighted sound (dBA), which ignores the lower frequencies, and is therefore deficient. http://www.cnrc.navy.mil/regions/cnrnw/installations/nas_whidbey_island/om/environmental_support/growlerfact.html Nevertheless, the Draft EIS at 4-194 states "... the 2012 study included a brief examination of low-frequency noise associated with Growler overflights at 1,000 feet AGL in takeoff, cruise, and approach configuration/power conditions ... The study found that takeoff condition ... overall C-weighted sound level of 115 dBC. The Growler would exhibit C-weighted sound levels up to 101 dBC when cruising and 109 dBC (gear down) at approach." Page 4-193 states "According to Hubbard (1982), a person inside a structure can sense noise through vibration of the primary components of a building, such as the floors, walls, and windows; by the rattling of objects; ..." The World Health Organization "Guidelines on Community Noise" (Berglund, 1999) states: "When prominent low frequency components are present, noise measures based on A-weighting are inappropriate;" "Since A-weighting underestimates the sound pressure level of noise with low frequency components, a better assessment of health effects would be to use C-weighting" <http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf> Closing windows and doors provides limited reduction for low frequency noise entering a building as measured by sound Transmission Loss tests. Therefore assumptions throughout the Draft assuming an average noise level reduction across the frequency spectrum with windows closed are not based on scientifically observed behavior of low frequency sounds. See graph on <http://windowanddoor.com/article/04-april-2007/understanding-basics-sound-control> RECOMMENDATION: Evaluate impacts of the Growlers at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). 2. The Draft EIS states (page 3-16) that aircraft noise levels represented in this draft EIS are "generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville." It further states that the computer model draws from "a library of actual noise measurements" (page 4- 20). There is no documentation on whether Growler measurements were used or if the model is based on another jet. We also do not know the conditions for the measurements, e.g. engine power, afterburners, distance, orientation, etc. For more information on this issue see Sections 2 and 3: http://media.wix.com/ugd/f9226a_af2c68d0670d466591fbbd7f062bab13.pdf RECOMMENDATION: Provide the noise measurement data used for simulation and an explanation of how the data was captured and processed. Provide Growler noise measurements with afterburners in one-third octave bands at various distances and orientations from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. The Draft EIS states (page 3-16) "The computer modeling program used for this EIS is NOISEMAP Version 7.2 (October 29, 2015), developed by Wyle Laboratories. ...The U.S. Department of Defense (DOD) uses NOISEMAP as the accepted standard noise modeling program for assessing potential noise exposure from fixed-wing aircraft." A 2004 study performed by Wyle for

- 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

DOD states “The latest NOISEMAP package of computer programs consists of ... NOISEMAP Version 7.2 ...” The version used in the Growler EIS is at least 12 years old, not a year old. <http://www.nctcog.org/trans/aviation/jlus/noisestudy04.pdf> The 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.” SERDP project WP-1304, led by Principal Investigator Dr. Kenneth Plotkin of Wyle issued a final report titled “Advanced Acoustic Models for Military Aircraft Noise Propagation and Impact Assessment” in 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 GE F414 jet engine as the Growler] differs from those of most prior aircraft, with high noise levels associated with higher thrust engines. ...” “Moreover, the ... 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 ... model that produces more physical realism and detail than traditional ... model.”

<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304> For more information on this issue see Section 1 - http://media.wix.com/ugd/f9226a_af2c68d0670d466591fbd7f062bab13.pdf

RECOMMENDATION: Redo the noise level simulation using the more recent Advanced Acoustic Model. 4. Day-Night Noise Level (DNL), the fundamental noise metric in the Draft, represents “the energy-averaged sound level measured over a 24-hour period” (Section 3.2.2.1). An FAA study, “Technical Support For Day/Night Average Sound Level (Dnl) Replacement Metric Research,” finds “... DNL has another major practical limitation. It doesn’t work particularly well as a predictor of aircraft noise impacts. FICON’s 1992 relationship accounts for less than a fifth of the variance in the association between aircraft noise exposure and the prevalence of high annoyance in communities (Fidell, 2003; Fidell and Silvati, 2004).”

https://www.faa.gov/about/office_org/headquarters_offices/apl/research/science_integrated_modeling/noise_impacts/media/6-14-2011_FinalReport_MetricsMestre_etal_061411_part1.pdf The Day-Night Noise Level (DNL) was developed for the FAA to established a threshold for annoyance at commercial airports with typical operations 16 hours a day, 7 days a week. The noise events experienced during Growler training flights is intermittent in a region with very low background noise. The noise assessment in the Draft instead spreads the annual training operations over 365 days to calculate Annual Average Daily (AAD) day and night events (at 4.2 on page A-35). In actual experience these events are concentrated into some number of days in a year, which is not specified in the analysis. We use actual data below to demonstrate this. Figure 4.1 shows training flights from Ault Field in 2014 using data provided by the Navy. Ault Field has significant impact on San Juan County. Included are weekly totals of Field Carrier Landing Practice (FCLP) and Controlled Carrier Approach (CCA) activities. The FCLP is the focus of the Proposed Action (page ES-1). Flying is intermittent and concentrated into certain periods. The maximum number of weekly flights was 1088. On the other hand there were 16 weeks with no flights and 25 weeks, or half of the year, with fewer than 100 flights. There were 13,422 flights reported in 2014. Spread over 52 weeks in a year that yields an average of 258 flights per week. Considering only the 27 weeks with more than 100 flights there

were an average of 497 flights per "active flying week." During "active flying weeks" citizens experienced 93% more jet noise impacts than an annual average portrays. San Juan County collects Growler noise reports from citizens (see Comment 6). Figure 4.2 is a chart of the daily reports from 2016. The number of reports over an hour, day, week or other period indicates a level of annoyance. Looking at the daily variability, impact on citizens in San Juan County is clearly intermittent. The maximum number of noise reports in one day was 75. There were 112 days with no reports. Assume that a day with 5 or fewer reports represents limited annoyance. There were 242 days with 5 or fewer reports. That leaves 124 days with significant annoyance, or about one-third of the year. Averaging significant noise events over 365 days rather than 124 days greatly diminishes the impact citizens experience when Growlers are flying. Both the Navy flight data and citizen noise reports paint the same picture. Growler noise events are intermittent. While commercial airports have busy periods at certain times of the day, they are active 365 days a year. Growler training flight activity at Ault Field has extended quiet intervals, lasting for days or even weeks. When Growler flights resume after a quiet period the noise is startling, increasing the annoyance. Averaging Growler noise events over 365 days when the events are intermittent assumes that quiet days mitigate the noisy days. No scientific evidence is provided in the Draft to support that assumption. The averaging inherent in the DNL metric developed for commercial airports is inappropriate for analysis in the Draft. Averaging over the year greatly underestimates the impacts on citizens and leads to an incorrect conclusion that the region is not significantly impacted by the Proposed Action. Under all the Alternatives, Total Operations increase by 47% over the No Action Alternative (Table 2.3-1). The DNL metric is inappropriate for understanding the consequences. RECOMMENDATION: For averaged noise metrics, noise levels should only be averaged over active flying days. 5. The Draft EIS at 3-22 states "No studies have shown a definitive causal and significant relationship between aircraft noise and health. Inconsistent results from studies examining noise exposure and cardiovascular health have led the World Health Organization (WHO) (2000) to conclude that there was only a weak association between long-term noise exposure and hypertension and cardiovascular effects." The statement above disagrees with multiple findings in the WHO "Guidelines on Community Noise" (Berglund, 1999): "For a good night's sleep, the equivalent sound level should not exceed 30 dB(A) for continuous background noise, and individual noise events exceeding 45 dB(A) should be avoided." "For noise with a large proportion of low frequency sounds a still lower guideline is recommended" "It should be noted that a large proportion of low frequency components in a noise may increase considerably the adverse effects on health" "The evidence on low frequency noise is sufficiently strong to warrant immediate concern" Waye (2004) finds "As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings. Sleep disturbance, especially with regard to time to fall asleep and tiredness in the morning, are commonly reported in case studies on low frequency noise. However, the number of studies where sleep disturbance is investigated in relation to the low frequencies in the noise is limited. Based on findings from available epidemiological and experimental studies, the review gives indications that sleep disturbance due to low frequency noise warrants further concern." <http://www.noiseandhealth.org/text.asp?2004/6/23/87/31661> Specific guidelines are found in the "WHO Night Noise Guidelines for Europe" (2005), Table 5.1, "Summary of effects and threshold levels for effects where sufficient evidence is available." http://www.euro.who.int/__data/assets/pdf_file/0017/43316/E92845.pdf

During Scoping 1785 comments were submitted on Noise and Vibration and 914 on Health Effects (Table 1.9-5). Under all the Alternatives, Total Operations increase by 47% over the No Action Alternative (Table 2.3-1). The Navy has not demonstrated that there are no health impacts from the proposed Growler additions. RECOMMENDATION: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise", "Night Noise Guidelines for Europe" and other published studies. 6. The Draft includes some independent noise measurements and ignores others. Section 1.9.5 states "The Navy continues to evaluate noise reports that have been developed by independent sources and review their findings in conjunction with this EIS analysis." Not included in the Draft EIS is data collected by San Juan County (SJC) Data collected since May 14, 2014 has been regularly sent to NASWI. More than 6000 citizen reports include date, time, location and noise characteristics. See a sample chart in Figure 6.1. The Navy should correlate that data with the information they collect on flight tracks to understand what activity causes disruptive noise in SJC. Actual noise reports and measurements should be used to benchmark the computer modeled noise impacts relied on for decision-making. Noise reports can also help to understand the benefits of mitigation measures.

<http://sjcgis.org/aircraft-noise-reporting/> Also not included is the study sponsored by Citizens of Ebey Reserve. They engaged an independent noise study by JGL Acoustics in 2013 to obtain actual on-site Growler noise data at Outlying Field Coupeville because "rather than simply accept the computer-modeled data used by Wyle Labs because we believed on-site validation was critical."

[http://citizensofebeyreserve.com/References/Files/JGL Noise Report.pdf](http://citizensofebeyreserve.com/References/Files/JGL%20Noise%20Report.pdf)

RECOMMENDATION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft EIS suggests that the lands and waters of the San Juan Islands National Monument are exempt from National Environmental Policy Act protection because the 2013 proclamation establishing the Monument 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 only has the effect of preserving the status quo: 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 Monument area from federal laws that already applied to wildlife there. Hence creation of the Monument did not exempt the Navy from NEPA or Endangered Species Act with respect to wildlife in the Monument, such as Marbled Murrelets or marine mammals. At 3.5.2.4 the Draft EIS acknowledges "However, the Bureau of Land Management (BLM) has determined that BLM-owned and controlled lands in the San Juan Islands National Monument possess wilderness characteristics." It also concedes that the Monument is subjected to a maximum noise level of 95 dB (SEL) an estimated 372 times per year (at 3-34). For more information on this issue see

http://media.wix.com/ugd/f9226a_c2a40618270749a4b74a6d43bb2a19c3.pdf

RECOMMENDATION: 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. In 2014 the Department of Defense successfully demonstrated carrier takeoff, landing, and formation flying capabilities of the X-47B prototype ("drone") that is part of the Unmanned

Carrier-Launched Airborne Surveillance and Strike (UCLASS) program. <http://breakingdefense.com/2014/08/x-47b-drone-manned-f-18-take-off-land-together-in-historic-test> The UCLASS jets can meet the Purpose and Need, delivering the same capability for electronic surveillance and attack against enemy radar and communications systems as the Growlers. This Alternative has many benefits. Because of its inherent automation UCLASS would significantly reduce the amount of land-based training that impacts our region. It eliminates the high risk to the Growler's two-person crew from advanced anti-aircraft threats. The smaller UCLASS vehicle is lighter and uses less fuel. Eliminating the \$3 billion purchase of 36 Growlers will save taxpayer money. Navy Secretary Ray Mabus said "[the F-35] should be, and almost certainly will be, the last manned strike fighter aircraft the Department of the Navy will ever buy or fly." With a focused effort the Navy can deploy the UCLASS while the existing 82 Growlers plus spares carry out the mission. RECOMMENDATION: 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 (see Section 3.10.2). San Juan and Jefferson Counties are excluded from the socioeconomic impacts analysis but sites in those Counties appear in the Points of Interest (Figure 3.2-6) and experience significant Single Event Noise (Tables 3.2-4 through 3.2-8). Clallam County may also be impacted by Growler noise but no noise analysis was done for this area. The San Juan County Comprehensive Plan states "...the islands are places of peace ... We support a pattern of economic growth...which recognizes the rural, residential, quiet, agricultural, marine, and isolated nature of the islands." Anecdotal evidence from San Juan County realtors is that property sales have been lost due to Growler activity. The three counties excluded from the socioeconomic analysis are very dependent on outdoor recreation that is being harmed by Growler flight activity. These Counties receive little, if any, economic benefit from employment and other activity associated with NASWI. RECOMMENDATION: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties. 10. At 1-20 the Draft EIS discusses Noise Mitigation. The only cited measure in place is "to share flight schedules and other information and to solicit public feedback." Potential measures include construction and operation of a noise suppression facility for engine maintenance (Hush House), Engine Chevrons (noise reduction) and MAGIC CARPET (automating parts of carrier landing which will reduce FCLP training activity). Further discussion on Existing Mitigation at 3-30 states "NAS Whidbey Island has noiseabatement procedures ... to minimize aircraft noise. Airfield procedures used to minimize/abate noise ... include optimizing of flight tracks, restricting maintenance run-up hours, runway optimization, and other procedures ... Additionally, aircrews are directed, to the maximum extent practicable, to employ prudent airmanship techniques to reduce aircraft noise impacts and to avoid sensitive areas except when operational safety dictates otherwise." Each Alternative is an irrevocable decision to add 35 or 36 Growlers at NASWI. Therefore the Navy should commit to Mitigation Measures as part of the Final EIS and Record of Decision. Since experts have identified the need for additional research on health effects of low frequency noise the Navy should sponsor this research. RECOMMENDATION: 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 as described in the comments above and by others, and is inadequate to support a decision. Council on Environmental Quality (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.” RECOMMENDATION:
Supplement the EIS to address deficiencies identified in comments and allow further
opportunity for public comment before the Final EIS is prepared.

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This letter of comments is an expanded version of my signed letter, dated Dec 5, 2016, that I submitted in person to the comment box at the Navy's Dec 7, 2016 Open House public meeting on Lopez Island. Having had the opportunity to talk to the Navy officers and others at various info stations at the meeting, I have additional comments and questions, which are presented here along with my previous comments. An "*" at the beginning of a paragraph denotes that the paragraph is new comments, not previously presented in the Dec 5, 2016 version. My comments and questions in response to the draft EIS for EA-18G Growler airfield operations at NASWI complex are as follows: 1. Use of outdated and flawed noise simulation model Aircraft noise levels represented in this draft EIS are "generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville" (page 3-16). The computer modeling program used for this EIS is "NOISEMAP Version 7.2 (October 29, 2015), developed by Wyle Laboratories.... The U.S. Department of Defense (DOD) uses NOISEMAP as the accepted standard noise modeling program for assessing potential noise exposure from fixed-wing aircraft NOISEMAP is routinely updated and validated through extensive study (Lundberg, 1991; Speakman, 1989; Lee, 1982; Seidman and Bennett, 1981; Rentz and Seidman, 1980; Bishop et al., 1977; and Dundoradale, Horonjeff, and Mills, 1976) to provide the best possible noise modeling results for these applications." [1] Firstly, the date "October 29, 2015" in parenthesis after NOISEMAP Version 7.2 is misleading. What does the date refer to? When was NOISEMAP Version 7.2 first released? In my quick research, NOISEMAP Version 7.2 was used in a study completed in August 2004.[2] This evidence suggested that version 7.2 is at least 12 years old. Based on the latest "routine updates" cited above (Lundberg 1991) in the draft EIS, the last update may have been in 1991, over 25 years ago? 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.[3] The 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." [4] 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.[5] 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." In other words, higher velocity jet exhaust (from higher thrust aircraft

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 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
- 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
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.t. Noise Mitigation

like Growlers) produce more non-linear turbulence and greater sound intensities than older, less powerful aircraft. The fact that NOISEMAP was based on linear acoustics means that it does not properly simulate the non-linear sound dynamics characteristic of the Growlers. In addition, NOISEMAP can only model one or more aircraft as an "integrated" monolith object. So it does a poor job of modeling complex flight operations where multiple aircrafts fly simultaneously in different patterns. AAM, on the other hand, does include the effects of nonlinear sound propagation, as well as terrain, weather and other features, resulting in time simulation that produces more physical realism and detail than NOISEMAP. Also, AAM allows each aircraft to be modeled separately as a 3D noise source and produce composite results of these individual units. Given the existence of newer computer models with superior capabilities and more accurate noise assessment like AAM since 2010, why did the Navy use the flawed and dated NOISEMAP as the modeling tool for this draft EIS? The unfortunate choice of NOISEMAP has thus rendered the noise analysis in the entire draft EIS scientifically inaccurate and potentially legally indefensible with respect to the requirements of the National Environmental Policy Act of 1969 (NEPA). *My understanding of the limitations of NOISEMAP was confirmed by Mr. Patrick Kester of Wyle Laboratories at the December 7 public meeting on Lopez Island. In addition, I learned that all noise levels reported in the draft EIS were done based on NOISEMAP simulation of one aircraft. This assumption, a consequence of NOISEMAP's limitations, is very different from the actual planned flight operations of multiple (up to 5) Growlers taking off in quick succession and flying together in a formation. This means the reported noise levels and duration of noise exposure were grossly inaccurate and underestimated, particular for single event noise metrics. Mr. Kester also confirmed that the AAM would have had no problem simulating Growlers' noise emissions as coming from 5 separate noise sources. *When asked about why Wyle's noise study for the draft EIS used the flawed, outdated NOISEMAP despite the availability of AAM, also created by Wyle Laboratories, Mr. Kester informed that AAM was still under review by the Defense Noise Working Group and is not officially endorsed by the DOD as the official choice of noise simulation model for doing noise assessments yet, despite known limitations and disadvantages of NOISEMAP. (Wyle developed both NOISEMAP and AAM). Is the information I received from Mr. Kester accurate? If so, what is the DOD Noise Working Group's time line for reviewing and approving the AAM? What explains the long deliberation process by the Working Group, considering that the AAM was completed since April 2009, over 7 years ago? Are there legal provisions that prohibit the Navy from using improved noise models that are not officially sanctioned by the DOD? If the delay in approving the AAM is due to neglect or negligence on the DOD's part, are the public and affected communities supposed to be subject to sub-standard, untrustworthy noise assessments? The DOD's failure to act in a timely manner to review the AAM is not a legally defensible justification for not using the best available science to conduct noise assessment for the draft EIS. Recommendation: All the noise assessments in the draft EIS should be redone using a more accurate noise simulation model such as AAM.

2. Lack of noise data (transparency) Even if the choice of noise simulation model were scientifically and legally defensible, the quality of data used as inputs into the model would still be questionable. First, it is unclear what kind of noise data were used as a basis for noise assessment calculations in the noise simulation program (NOISEMAP). The draft EIS states on page 3-16 that aircraft noise levels represented in this draft EIS are "generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville." But has there ever been any actual noise measurements of a Growler

anywhere? If not, what types of aircraft were used as proxies and how are they different than a Growler? If so, when and where were the noise measurements taken? By whom? What were the positions of the microphones? Under what operating conditions? The 716-page draft EIS Volume I inadequately describes the specifics of the noise measurement data used as a basis for the noise exposure modeling. Without this information, readers have little basis upon which to judge the validity and relevance of the data and noise assessments. The only mention found was that the computer model draws from “a library of actual noise measurements” (page 4-20) with no details provided. On page 24 of Appendix A in Volume II of the draft EIS, the reader is informed that the only data inputs into the NOISEMAP model were “the data described in Sections 4.1 through 4.3.” However, sections 4.1 through 4.3 contain no noise data, only the number and types of flight operations, runway and flight track patterns, and frequency and durations of maintenance “run-ups”. This means that NOISEMAP is treated by the draft EIS as a “black box”. Flight operational data and other pertinent non-sound data are the only transparent inputs into the NOISEMAP model. The entire 1,500 pages of the two-volume draft EIS has nothing to offer to the readers regarding the quality of the aircraft jet noise measurement data used by NOISEMAP to simulate Growlers’ jet noise impacts. This lack of data transparency makes it difficult to assess the credibility of the noise exposure simulation in the draft EIS. If the Navy is confident about the quality and scientific rigor of the noise data it used to do the sound exposure modeling, it should transparently share this information. Otherwise, we cannot trust the black box simulation-based noise assessments in the draft EIS. The onus is on the Navy to prove that the existing data are of good enough quality to justify the lack of taking actual near-field and far-field noise measurements on site. *At the December 7, 2016 public meeting on Lopez Island, I was directed to ask Mr. Patrick Kester of Wyle Laboratories regarding noise measurement data. Mr. Kester reassured me that NOISEMAP draws from a library of noise measurement data, called NOISEFILE, that were done based on actual tests of various types of aircraft under different operational conditions, including from run-up to take-off, to landing. The tests were performed in a quiet desert environment to ensure accurate measurements. If the information provided by Mr. Kester is true, the draft EIS should have included such important details. When asked why such information was missing from the draft EIS, Mr. Kester said there was an indirect reference to the noise data, cited in one of the references on p. A-143 of Volume II, namely “Czech, J.J. and K.J. Plotkin. 1998. NMAP 7.0 User’s Manual. Wyle Research Report WR 98-13.” When I looked up this reference later, I found it to be a user’s manual that “describes the features of the NOISEMAP (NMAP) 7.0 computer program and its operation,”[6] nothing about the details of noise measurement data and how they were obtained. Though my questions remained unanswered, Mr. Kester’s response confirmed my observation that the draft EIS lacks transparency of empirical noise data, and likely lacks empirical noise measurement data as well. Moreover, several communities have done actual far-field noise measurements and provided the data to the Navy to be included in the noise assessment. It is unclear if and why the draft EIS did not include these noise measurement data. Recommendations: The draft EIS must provide details of assumptions and noise measurement data used or not used in noise simulation. Details should include types of aircraft, time and place of measurements, positions of microphones, aircraft operational conditions during measurements, etc. It should also take the community measurement data into consideration and compare and contrast different sources of data. 3. Need for actual noise measurement data Once the details of

noise measurement data are provided, the public and affected communities should have the opportunity to determine whether or not “the library of noise measurement data” the computer model draws from is scientifically adequate as a basis for all calculations to evaluate noise impacts. If not, the Navy needs to conduct actual near-field and far-field noise measurements of Growlers under varying operation conditions on site and nearby. Though objectionable, the fact that the draft EIS did not provide data transparency on jet noise was not surprising. In April 2009, the blue ribbon Naval Research Advisory Committee (NRAC) panel on jet engine noise reduction found that “[t]here has never been a requirement for engine noise in the design of engines for tactical jet aircraft, nor does the Navy measure or maintain an engine noise data base for tactical aircraft. The Air Force does maintain the only known acoustic database which includes both tactical and transport aircraft, including many Navy aircraft. This database has flyover measurements and some near-field measurements from engine run-ups. There have not been Navy requirements for similar measurements other than providing an environmental impact statement for the surrounding community.”[7] The NRAC went on to recommend that while “[t]here are currently standards for outdoor far-field noise measurements established by the American Society for Testing and Materials and the American National Standards Institute which are applicable to commercial type aircraft, [s]tandards must be established for acquiring near-field, far-field ground run-up, and flyover noise for tactical jet aircraft. Tactical jet aircraft can have higher noise directivity variations that existing far-field measurement standards for commercial aircraft do not address, and there are no standards for acquiring near-field aircraft noise data. Methods for quantifying near-field, high-amplitude sound levels for sources that vary in time and space will need to be defined. Emphasis should be given on developing methods to enable valid comparisons of noise levels among aircraft.”[8] In sum, NRAC’s findings highlighted the Navy’s lack of jet noise data measurements, lack of consistent measurement methodology and standards, and lack of jet noise database and its proper maintenance. NRAC’s insightful assessments and sensible recommendations were made to the Navy since April 2009. If the Navy has not acted on the NRAC’s recommendations, it could start now with taking proper Growler noise measurements as a key input into preparing a scientifically and legally defensible draft EIS. Recommendations: The Navy should identify consistent methodology for jet noise measurements and conduct proper measurements for the purpose of completing the draft EIS. The Navy should incorporate in its practices the other recommendations put forward by NRAC to reduce jet noise from its tactical aircraft.

4. Inclusion of operational strategies for jet noise reduction In addition to the recommendations mentioned above, NRAC in the same study[9] offered many other useful strategies for the Navy to reduce jet noise from Growlers and other aircraft, including:

- Commercial aircraft use a procedure called “cutback” in which engines are throttled back just after takeoff. The aircraft then climbs at a slower rate until away from the airport community and then resumes a higher climb rate. This procedure is perhaps the most promising and practical for reducing noise near military air fields because it does not require changes to the aircraft – and can reduce jet noise by 10 dB or more.
- Eliminating afterburner during takeoff will also provide a significant noise reduction benefit. Afterburners increase the jet noise levels by 5 to 10 dB above military power.
- Retrofit all F/A-18 F-414 engines with chevrons on the exhaust nozzles to reduce noise by 3 dB.
- The Navy should have a policy to systematically measure or maintain an engine noise data base for all tactical aircraft. In addition, NAVFAC (Naval Facilities Engineering Command) in its June 2009 study has found that Noise Attenuating Device

(NAD) could reduce pollution emissions from both particulates and NO_x as well as reduce jet engine noise by more than 20 dB. NAD fabrication also costs only 6% of a typical “hush house” installation, making it very cost-effective.[10] Noise mitigation measures should certainly include NAD for Growlers. Additional long-term measures relating to the design and procurement of tactical jet aircraft are discussed as an appendix to this letter. Recommendations: The draft EIS incorporate the operational strategies for effective jet noise reduction as recommended by the NRAC and NAVFAC, as discussed above.

5. More complete and accessible presentation of noise assessment results The noise metrics used in this draft EIS to present the results of the NOISEMAP modeling are Day-night Average Sound Level (DNL), Equivalent Sound Level (Leq), sound exposure level (SEL), maximum A-weighted sound level (Lmax) and Number of Events above a Threshold Level. These metrics are helpful but incomplete and insufficient. There are other metrics that, if included, would provide a more complete picture of noise exposures. These include C-weighted Sound Exposure Level, Effective Perceived Noise Level (see sample below), and Weighted Equivalent Continuous Perceived Noise Level. Figure 1 The scale of the bar graph in this figure is based on perceived noise level. These metrics are part of the featured outputs of the Advanced Acoustic Model (updated version of NOISEMAP) and can be easily created by the program. To make the noise metrics more easily understood by laypeople, the program also provides options of presenting the modeling results in graphical formats that are visual and accessible, such as noise contour animation video (see a sample snapshot below). In addition, it is very important that the public and affected community members know and understand the profile of sound levels across the different frequency spectrums. Different frequency sounds or vibration have different impacts, health or otherwise. The two figures below show equivalent sound levels of different frequency sounds. The results are based on sound measurements from a test of a F404 jet engines used in fighter jets “Hornets”.[11] As seen in the following two graphs (red bars for unattenuated sound, from positions 90 feet and 2 miles away respectively), high thrust engines not only have audible noise impacts but also inaudible low-frequency “windows rattling” pressure waves. Notice how the inaudible (below 20 Hz) frequencies may be even “louder” if the graph the continued to the left. It is also worth noting that lower frequency sound waves travel through air much better higher frequency ones (see Figure 4.14). If this kind of detailed visual presentation of noise profile from Growler operations would be very helpful for readers to have a more complete understanding of the noise impacts. It is important that the Navy provide a similar set of frequency spectrum sound levels for Growlers as shown in Figures 4.13 and 4.14 below, but with even wider range for low frequency sound waves. Because F414 engines used in Growlers have about 35% more thrust than F404 engines, the noise impacts, near-field and far-field, are likely to be more pronounced, particularly in the low frequency region? Recommendations: The draft EIS should include a more comprehensive list of sound metrics (including frequency spectral distribution of sound levels that cover inaudible low-frequency range, and C-weighted Sound Exposure Levels) and present them in more visual and easily accessible formats.

6. Ongoing noise monitoring and reports In Australia, the Department of Defense has an ongoing sound monitoring and noise report programs as an added measure of accountability to ensure that the actual noise from flight operations do not exceed the levels predicted in the Public Environment Report (the Australian equivalent of EIS).[12] This is a best practice that the Whidbey NAS could consider incorporating in the EIS and as an ongoing measure if the proposed action is approved.

Recommendations: Incorporate an ongoing noise monitoring and annual Growler noise reports as seen in the Australian example. 7. Page number of the draft EIS report One of the laws and regulations this draft EIS is supposed to comply with is CEQ Regulations for Implementing NEPA (40 Code of Federal Regulations [CFR] parts 1500-1508). Section 1502.7 of CEQ Regulations on page limits states that “The text of final environmental impact statements...shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages.” This draft EIS comprises two volumes each over 700 pages. Yet, it fails to provide essential information such as the noise measurement data, as discussed above. Was the EIS written in such a lengthy format in order to obscure the lack of essential data? To be in compliance with pertinent laws and regulations, the final EIS needs to be more substantial yet significantly more succinct. Because the draft EIS is significantly out of compliance with CEQ Regulations on page limits, the Navy should, at the very least, allow more time for citizens to review and comment on the EIS. Recommendations: The Navy should allow more time for citizens and affected community members to review and comment on the 1,500-page draft EIS. In revising the draft EIS, the Navy should be significantly more succinct to be in compliance with Section 1502.7 of CEQ Regulations for Implementing NEPA. 8. *Total number of Growlers at NASWI *At the Navy’s Open House public meeting on Lopez Island on December 7, 2016, I had a chance to talk to a senior officer in uniform who I learned was from Norfolk, VA (Naval Facilities Engineering Command Atlantic?). He informed me that there were currently over 100 Growlers already stationed at NASWI, and that the number would increase to roughly 160 when all the procured Growlers were manufactured, tested, and flown one by one to Whidbey Island. Based on the draft EIS, there will be a maximum of 118 Growlers in active operations. If the total number of procured Growlers to be stationed at NASWI is 160 as I was informed by the senior officer, this means the remaining 42 Growlers will be “spare”? Given the costs involved, it is difficult to believe that 42 spare Growlers are needed for an active fleet of 118. Is it possible that additional Growlers may be further added to the current proposed addition of 35-36 Growlers to the existing 82 in active operations? If so, why is there no mention in the current EIS process? If not, what kind of maintenance routines would be needed to keep spare Growlers in good working conditions year after year? Do they have to be “run” occasionally to keep engines in working order? At a minimum, the draft EIS should include a description of the maintenance routines of these spare Growlers and an analysis of their potential environmental impacts, including noise and air emissions. *Recommendations: The Navy should provide details regarding plans for all the 160 Growlers at NASWI in the draft EIS, at least for the accumulative impact analysis to be complete and meaningful. The draft EIS should also include impact analysis of the maintenance routines of spare Growlers. In conclusion, the draft EIS is incomplete and has such serious analytical deficiencies—including the usage of flawed, outdated NOISEMAP as the main modeling tool to produce all noise exposure assessments, the lack of transparency around “the library of noise data” from which the NOISEMAP model draws, and the lack of empirical noise measurements of Growler operations—that the noise assessment results are found to be untrustworthy. Such questionable noise exposure results preclude any meaningful review of consequent noise impacts. To achieve compliance with NEPA and other relevant laws, the Navy will need to redo the noise assessment analysis using an improved, updated model like AAM and possibly making necessary empirical noise measurements of Growler operations. Otherwise, the noise exposure and impact analyses are unlikely to be scientifically or legally defensible.

CEQ Regulation 1502.9 (a) states that "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." In light of such inadequacies of this draft EIS as discussed above and the need for a significant revision, the Navy must issue a revised draft EIS, at least for the portions pertaining noise impacts, to be compliant. Only after a properly revised EIS is issued can citizens and affected community members meaningfully review and comment on the Navy's analysis of noise impacts resulting from the proposed action and alternatives of adding 35 to 36 Growlers. Thank you for your consideration and action on my questions, comments and recommendations. Yours sincerely, [REDACTED]

[REDACTED] Lopez Island, WA 98261 Enclosure Appendix: Long-term strategies for noise reduction Appendix: Long-term strategies for noise reduction Beyond the scope of this EIS and Growler operations at Whidbey NAS are issues that the Navy should address in the procurement process for tactical jets for successful long-term reduction in noise. The following recommendations by the NRAC warrant special attention:

- There should be a requirement for engine noise in the design of engines for tactical jet aircraft.
- The development and application of high fidelity prediction tools is critical to the understanding of jet noise source mechanisms and the ability to evaluate noise reduction concepts. This is deemed to be an essential step to reducing jet engine noise beyond 3-5 dB.
- The propulsion community (i.e., government, industry and academia) agree that in order to achieve significant reductions in tactical jet engine noise, a path similar to that followed by commercial aviation must be followed. This involves the airframe prime contractor (e.g. Boeing) having the responsibility for the noise signature of the airplane. Today the engine is developed and procured as government furnished equipment (GFE) to the airframe prime contractor. As a result the airframe prime contractor does not have total system design responsibility. How the engine is integrated into the airframe can have a big impact on the total noise signature of the aircraft. The DOD strategy has been to separately specify and contract for the performance and signature requirements of the aircraft and its propulsion system. This acquisition strategy leaves no one company responsible for successfully meeting the full system of systems requirements.
- Unfortunately, acoustic signatures have not been critical performance parameters in military tactical aircraft system development programs. For future aircraft programs, concern should be paid to acoustic signature effects on the hearing of Navy Sailors and Marines as well as the environmental effects on the local air base communities. The Navy must rethink how to incorporate lower noise signatures into a full system parameter requirement. This new contracting strategy will allow the prime contractor, in concert with the propulsion system contractor, to initially tradeoff the contributions of the various signature elements with the normal system performance elements (e.g., speed, range, and maneuver) and perform a system level optimization taking all elements into consideration. Without integrating all performance and signatures together, there cannot be a system of systems optimization. In order to make significant reductions in aircraft noise, aircraft system contracts need to specify a noise requirement. This can be done by establishing noise as a Key Performance Parameter (KPP) and incentivizing the prime contractor and the propulsion system subcontractor to develop designs which meet this KPP. Though NRAC's recommendations in 2009 were not yet implemented, it is not too late for the Navy to start now. The draft EIS mentioned more than once that "it is Commanding Officer, NAS Whidbey Island policy to conduct required training and operational flights with as minimal impact as possible, including noise, on surrounding communities." Such a successful long-term implementation of the said

policy, it is essential that the Navy take into serious consideration and act upon the recommended strategies for reduction jet noise impacts on its own personnel and surrounding communities. End notes: [1] Draft EIS, p. 3-16. [2] Wyle Laboratories, Aircraft Noise Study for Naval Air Station Joint Reserve Base Fort Worth Fort Worth, Texas, August 2004, p. 1-3. Accessed on 12/3/2016 from <http://www.nctcog.org/trans/aviation/jlus/noisestudy04.pdf> [3] SERPD, "Advanced Acoustic Model Technical Reference and User Manual" Project WP-1304, August 2010. Accessed on 12/3/2014 from <https://www.serdp-estcp.org/content/download/9133/109364/file/WP-1304-TR.pdf> [4] <https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304> [5] Ibid. [6] Page 1 of the same reference, accessed on 12/9/2016 from <http://www.dtic.mil/cgi-bin/GetTRDoc?AD=ADA406645> [7] Naval Research Advisory Committee (NRAC), Report on Jet Engine Noise Reduction, April 2009. Accessed on 12/3/2016 from <https://ntrs.nasa.gov/archive/nasa/casi.ntrs.nasa.gov/20020024448.pdf> [8] Ibid. [9] Ibid. [10] NAVFAC 2009, Reduction of Noise from the J052 and F-404 Jet Engines During Static Testing Using the Noise Attenuation Device (NAD). Accessed on 12/3/2016 from <http://www.dtic.mil/cgi-bin/GetTRDoc?AD=ADA527661> [11] NAVFAC 2009, Reduction of Noise from the J052 and F-404 Jet Engines During Static Testing Using the Noise Attenuation Device (NAD). Accessed on 12/3/2016 from <http://www.dtic.mil/cgi-bin/GetTRDoc?AD=ADA527661> [12] See the 2014 Annual Super Hornet Noise Report for example at http://www.defence.gov.au/AirCraftNoise/_Master/Docs/Environment/2015-11-26%20-%200ASH%20Noise%20Report%202014.pdf

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- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process

Failing to Address the 40 Additional Growlers at NASWI in the Draft EIS 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 Draft EIS states that The Proposed Action would: • continue and expand existing Growler operations at the Naval Air Station Whidbey Island complex, which includes field carrier landing practice by Growler aircraft that occurs at Ault Field and Outlying Landing Field Coupeville • increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment The Environmental Impact Statement evaluates the potential environmental impacts associated with the following resource areas: airspace, noise, safety, ... , as well as the cumulative impacts of the Proposed Action and other local projects. [emphasis added] [1] The Draft also states that the total number of Growler Aircraft at Ault Field will be 117 or 118.[2] A Department of Defense (DoD) report from 2016 states The procurement profile of the FY 2017 PB adds 7 EA-18G aircraft in FY 2016. The result of this addition will be a FY 2016 FRP contract for Lot 40 EA-18G aircraft, which increases the total Program of Record (PoR) from 150 to 157. ... These aircraft are in the process of delivery ... [3] Initial aircrew training will be conducted at NAS Whidbey Island, WA. ... Limited I-Level for some EA-18G and F/A-18E/F common maintenance tasks has been established at Whidbey Island, WA. Airborne Electronic Attack (AEA) I-Level maintenance will be stood up at Whidbey Island and aboard the CVWs commencing FY18.[4] It is clear from the DoD report that 157 Growlers will be based at NASWI at times, not 117 or 118 as described in the Draft EIS. The additional 40 Growlers are part of the same mission and are “in the process of delivery.” The Draft does not acknowledge the additional 40 Growlers, describe what activity they will undertake or analyze how that activity will impact the affected environment. For example, will maintenance engine run-ups be conducted on the additional Growlers? The Draft EIS has not fulfilled its obligation to “evaluate[s] the potential environmental impacts ... as well as the cumulative impacts of the Proposed Action and other local projects.” Council on Environmental Quality (CEQ) Regulation 1502.9 states (c) Agencies: (1) Shall prepare supplements to either draft or final environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. RECOMMENDATION: Supplement the EIS to address the 40 additional Growlers to be stationed at NASWI and allow further opportunity for public comment before the Final EIS is prepared. [1] Environmental Impact Statement for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex Volume 1, pg. Abstract-1 [2] *ibid*, Table 2.3-1 [3] Selected Acquisition Report (SAR), RCS: DD-A&T(Q&A) 823-378, EA-18G Growler Aircraft (EA 18G), As of FY 2017 President’s Budget, March 17, 2016, pg. 7. <https://goo.gl/IQrY4K> [4] *ibid*, pg. 37

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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

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2. Last Name [redacted]
3. Organization/Affiliation
4. City, State, ZIP Lopez Is. WA 98261
5. E-mail [redacted]
6. Please check here [checked] if you would NOT like to be on the mailing list
7. Please check here [checked] if you would like your name/address kept private

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Operations at Naval Air Station Whidbey Island Complex**

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Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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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.
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Lopez Island, WA 98261

Greenhouse gas emissions The greenhouse gas (GHG) emission calculations in the EIS have a variety of errors and substantially under-report CO₂e emissions. Issue #1: failing to account for significant flying that happens between “takeoff” and “landing” The calculations of GHGs include separate calculations for take-offs (Departures), Interfacility Departures, Straight in Arrivals, Overhead Break Arrivals, IFR Arrivals, Interfacility Arrivals, Field Carrier Landing Practice (FCLP) , Touch & Go Ops, Depart-Re-enter Ops, and Ground Control Approach (GCA) pattern Ops. The furthest flight distance any of these operations appears to cover is the GCA pattern Ops, which are described in the EIS as a straight-in arrival in which “the aircraft generally descends on a 3-degree glide slope through 3,000 feet AGL, 10 miles from the runway” (section 3.2.4.1). None of these describe the much wider flight tracks shown in figure 3.1-3 (page 3-8), not to mention that fact that Growler jets are routinely observed directly overhead more than 5 miles outside of the furthest of these tracks. What about the fuel consumption flying these paths which can have a diameters that (sometimes substantially) exceed 30 miles? To put it simply, there should be another category that captures these larger flight paths that Growlers often take between takeoff and landing that is not in listed in the operations for which greenhouse gas emissions are calculated. Issue #2: Fully accounting for afterburner use? The EIS has modified the duration of afterburner usage during takeoff from 30 seconds (as found "Straight-In Arrival LTO," "Break Arrival LTO" for F414-GE-400 Engines for operations at NAS Whidbey Island based on Table S-1, AESO Memorandum Report No. 9815, Rev H, November, 2015) to 20 seconds following an email from CDR Sean Michaels, May 12, 2016). What is the basis for the reduction in after burner usage? This is inconsistent with available all youtube videos of Growlers taking off with afterburners from ground-based runways that clearly indicate afterburner burn of more than 20 seconds. <https://www.youtube.com/watch?v=wG-JO9-3OeA> <https://www.youtube.com/watch?v=HZhlfGhIjK> Issue #3: Fuel usage figures in EIS nearly five times lower than implied by Selected Acquisition Report (SAR) Greenhouse gas emissions increases for additional Growlers is largely determined by estimates of annual fuel consumption by the aircraft. The EIS estimates “no action” annual Growler fuel consumption at 9,517,164 gallons in 2015 (EIS vol 2, Appendix B, “No Action Average Year Air Emissions NAS Whidbey Island Complex” page B-9) for existing 82 Growlers (including maintenance run-ups such as engine tests and water washes). - On average, this works out to 116,063 gallons of jet fuel per Growler per year. In the Defense Acquisition Management Information Retrieval (DAMIR) 2013 “Selected Acquisition Report (SAR) RCS: EA-18G Growler Aircraft (EA-18G),” EA18-G Growler fuel consumption for deployment at Whidbey Island Naval Air Station is listed as 1,304 per hour with an average flight hours per aircraft of per month of 34.2 (see page 35), or 410.4 hours per year. 1,304 gallons per hour multiplied by 410.4 hours per year is 535,161 gallons of jettfuel per Growler per year. What explains the greater than 4.6 fold difference (535,161 divided by 116,063) between annual per-Growler fuel use for budget purposes (in the Selected Acquisition Report) vs. the annual per-Growler fuel use in the EIS? As tax payers and as citizens concerned about the climate impact of these aircraft, which Navy figures are we to believe? Issue #4: EIS emissions should be validated with actual historic Growler fuel consumption The approach of breaking up flight ops into component

1.a. Thank You

18.a. Climate Change and Greenhouse Gases

18.b. Average Carbon Dioxide per Aircraft

18.d. Washington State Greenhouse Gas Goals

2.n. Alternatives Considered But Eliminated

6.b. National Ambient Air Quality Standards Compliance

parts and estimating the fuel consumption and GHG emissions for each should be validated with an accounting of the actual fuel consumption used by Growlers at Whidbey NAS for the most recent year on record. This is especially important given the vast (4.6-fold) difference between annual fuel consumption exhibited between data in the EIS vs. the 2013 Selected Acquisition Report (issue #3 in these comments) as well as the apparent omission of significant amounts of flying (issue #1 in these comments). Chris Greacen filed a Freedom of Information Act request on 8 December, 2016 for this information but has received no response. Issue #5: EIS may therefor mis-state increase in GHG emissions The EIS states that "The increase in greenhouse gas (GHG) emissions from the Proposed Action equates to less than 1 percent of all aircraft GHG emissions in Washington. Therefore, the GHG emissions from the Proposed Action should not have a significant impact on Washington's GHG emission goals." First of all, the assertion that an increase of "less than 1 percent of all aircraft GHG emissions in Washington" is "not a significant impact on Washington's GHG emissions goals" is inaccurate. The Alternative 1-A's calculated emissions increase of 161,302.7 metric tonnes per year is more than ten times higher than the greenhouse gas emissions associated with producing all electricity consumed in San Juan County (15561 metric tonnes annually) (based on 141,467 MWh sold and emissions factor of Washington state electricity of 110 kg of CO2 per MWh -- <http://www.opalco.com/about/> and <http://www.eia.gov/electricity/state/washington/>). Second of all, the increase in emissions that this "less than 1%" estimate is based on are very questionable, as discussed in issues #1 through #5 above. Issue #6: the Navy should commit to mitigation measures to reduce GHG emissions One potential measure identified in the DEIS is MAGIC CARPET (automating parts of carrier landing which will reduce FCLP training activity). An alternative not considered in the DEIS is to deploy Unmanned Carrier-Launched Airborne Surveillance and Strike (UCLASS) jets instead of additional Growlers. The smaller UCLASS vehicle is lighter, has only one engine and uses less fuel, reducing costs and CO2 emissions and, as it is unmanned, has no need to practice.

LOPEZ ISLAND, WA 98261

The Growler produces an intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft. I request the Navy evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA). Even better would be to make spectral data available so that other weightings (Z-weighting that does not discount low-frequencies) can be done.

1.a. Thank You

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

Oak Harbor, WA 98277

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
2.n. Alternatives Considered But Eliminated

I am very concerned about the planned expanded use of the OLF in Coupeville. The land all around the OLF is covered with small family farms that provide an abundance of healthy food for my family and the rest of the island community and expanding the use of the OLF to the proposed degree would effectively disturb and pollute the area to the point where it would be no longer suitable for farming. The Navy is excellent and finding other avenues and outlets for training pilots such as detachments to other fields for focused training. Our Island community benefits from having the Naval operations here locally, but there is always a cost. I think the OLF and the main operations of NASWI are already taxing our community enough with the jet noise and jet fuel that can be smelled throughout the island. More flights at the OLF would destroy many of the small farm operations that we that live here rely on. I'm sorry, but I sincerely request that if the Navy needs to increase their flight hours and training time that they would consider doing it elsewhere. I know these pilots train for carrier landings at many other fields that are as well equipped to handle this type of practice. I'm also well aware of the amount of flight time expended just to meet quotas and keep flight hours up to standards that are not actually required for training whatsoever. So please, don't think we in this community don't understand the full scope of these operations. Our burden is already high enough, and this effects your very military service members and their families that you are claiming to be trying to support. Thank you for your consideration.

Coupeville, WA 98239

I moved. It cost out family years of stress and money. Isobel moved. She lost 200K and lives in an RV. Liz moved. She is dying of cancer in Freeland. Our plumber moved a month after moving in. His son screamed "make them stop" each time jets fly. Our septic guy's brother moved. He feels bad he did not tell them about the jets. He had moved away 5 years earlier. Norman moved. His wife is dying. My old Admiral's Cove neighbors are destroyed. Our government made our neighborhood a runway and the Navy basked in popularity instead of ensuring buyers were warned before buying. Nortier said people got disclosure even though he knows legal disclosure of withheld. The Navy takes every cent for expansion instead of using appropriate amounts to protect servicemen and civilians. Shame.

1.a. Thank You
12.j. Property Values
12.n. Quality of Life
4.r. Nonauditory Health Effects
7.c. Noise Disclosure

1.a. Thank You



I came out here to tell all of you thank-you
for what you do. When I hear the planes over-
head I thank God for you & pray for you.

I took this photo & made this card, I meant
to give one to each of you but I didn't
bring enough. I know you may get a lot
of flack from our community - But my family
& I feel that WE LOVE JET NOISE! It is
the Sound of Freedom! I wish I had
time to thank all of you personally.
May God Bless You All.

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I live on the south end of Lopez Island. My family has been here since 1959 and we have been peaceful neighbors to NAS Whidbey. We learned to endure the Prowlers. But since the introduction of the EA-18G Growler, the quality of our lives has been destroyed by the horrific noise created by the field carrier landing practices. The ongoing blasts (often between 70-95 dBC inside our home) shatter my mental health and well being. Hearing is our only sense that detects 360 degrees around us. I experience

01/08/16

www.QuietSkies.info

the "startle reaction" and ~~vib~~ "vibration sickness" that ruins my day and my digestion. I am writer and now retired and the Growler plane has turned my world upside down. Sincerely, [REDACTED]

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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:

Feb. 20, 2017

I appreciate you considering these comments. I believe the points raised deserve attention, and will convince the Navy to address these deficiencies in the Draft EIS.

Sincerely,



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, Washington, 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

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:

Langley, WA 98260

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

The intensification of growler use is both unnecessary and terribly impactful on local communities of all kinds on our island. I write as a concerned mother, attorney and citizen. I ask you to seriously reconsider the intensification not for NIMBY reasons, but for the sake of some chance of peace in our world and a future for our children. You guys are so smart, you can do better than this. Sincerely, [REDACTED]

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

Date: 2/22/17

RE: Response to Draft Environmental Impact Statement (Draft EIS) for the continued and increased EA-18G Growler Operation at Naval Air Station Whidbey Island (NASWI).

Dear EA-18G Growler EIS Project Manager:

Please address each numbered comment listed below.

1. The U.S. Congress established Ebey's Landing National Historical Reserve (EBLA) in order to preserve and protect a 17,572 acre nationally significant area for all American people. It is a quiet, contemplative reserve, with scenic vistas, beaches, hiking trails and numerous nationally significant historic resources. Other than implementing the No Action Alternative, the Navy's undertaking will adversely impact the very special qualities that congress recognized to set it aside as a special place.

It is ironic that since the reserves inception, preservation-focused partnerships have created and maintained the very qualities that now the "Navy would prefer to use OLF Coupeville for all FCLPs because it more closely replicates the patterns and conditions at sea and therefore provides

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.j. Property Values
- 14.d. Bridges and Ferries
- 17.a. Hazardous Materials and Waste Impacts
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.e. Public Involvement Process
- 2.g. Agency Participation
- 2.h. Next Steps
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.d. Day-Night Average Sound Level Metric
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 6.f. Fuel Dumping
- 8.b. Section 106 Process
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

superior training". OLF is of course surrounded by farms, houses, schools, highway, hospital etc.; and other expected conditions one would find at sea. Maintaining a Dark Sky Policy in the reserve was for the American people, not the Navy.

2. The stated purpose of the proposed action is for "...operating additional Growler aircraft as appropriated by Congress". Has the Navy asked Congress for permission for to adversely affect (i.e. Obliterate) the qualities that make Ebey's Landing National Historic Reserve unique? Doesn't the Navy considerer this a "Taking"?
3. The Navy used a technical loophole by preparing an Environmental Assessment in 2005 rather than an EIS for the transition from Prowlers to Growlers, when they determined no significant effect FOR deployment to aircraft carriers. Then proceeded to transfer that finding to OLF. If flight operations continue at OLF an additional 8000 foot runway extension will be necessary, but no mention this action or environment impact evaluations' included in the current EIS. Will this require a "splitting of EIS" to accomplish?
4. The EIS application of Growler sound measurements are incorrect, they are indicated much lower than they really are. Loud jet noises are painful. If one was to slap the back of hand with a stick the pain would be intense, and if ask at that point what level of pain is felt, it would differ if asked 24 hours later; it's meaningless to average out the intensity over time for a real time experience. If flight operations were to increase to 135 a day you run out of time to average out anything.
5. Increase in flights at Coupeville will impact property values. How will this be addressed?
6. What is the average Growler flight hour between accidents?

7. What is the estimated number of souls living in the OLF Accident Potential Zones?
8. The Draft EIS was approximately 1500 pages, on the internet, or one 8 inch high binder copy in the town library. It contained many, many unreadable pages of graphs and charts for the public to digest. Basically 9 alternatives to figure out, with the Navy playing a shell game by not suggesting their preferred alternative. This is not what the CEQ had in mind. The public meeting served the Navy's purpose. Instead of giving the community one or two minutes to ask public questions for all to hear they were directed to small talking head stations, where their questions and concerns were not disseminated at the gathering, nor at a later time. News coverage (local paper) said meeting was held, period.
9. Other alternative locations for FCLP could, in fact, be practical, and would, in fact, be reasonable use of taxpayer dollars, and surely as closely proximate at sea conditions, as the fields, homes roads parks etc. that Coupeville offers. The continued use of FCLPs in central Whidbey has far ranging adverse effects for the NW Region. The Navy works for Citizens of the USA, not the other way around.
10. The flight/noise contours outlined in the EIS are clearly inaccurate, and do not represent true flight paths or noise levels. I often walk a trail parallel and Adjacent to Zone 3 and the noise level is much higher than indicated, and training flight do not always "stay the course".
11. The EIS does not discuss the type, amount, intensity, or effects on adults or children concerning the electronic emissions used during FCLP at OLF. It is observable on overflights as home lights come on and off during practice
12. Whidbey Island does not have the infrastructure to sustain an influx of personnel. There is only one bridge and two ferries proving access to the island. Available housing is none existing. One major two-lane roads runs

the length of the island, and bottle necks at the three locations to leave the island. Drinking water for Oak Harbor is piped in off island from the Skagit River, many miles away. Ground water in Oak Harbor is contaminated.

13. The Cultural and Historical Resource Section of the EIS is basically non-existent and does assess or report on the true adverse effect on the resources.
14. The Washington State Dept. of Health has recently released a statement that the Growlers have a severe noise impact on public health. This apparently differs from the findings in the EIS. Their study finds that with Growler noise there is "increasing evidence that noise exposure is associated with annoyance, sleep disturbance, cognitive impairment and adverse cardiovascular outcomes".
15. NAS Whidbey has multiple Super Fund Sites, and currently is leaking hazardous material into the islands ground water. If additional aircraft are deployed what other hazardous wastes can be expected; to date the Navy's environmental record on Whidbey Island is very poor. Water testing completed by the Navy near OLF indicates some contaminated ground water. The Navy is currently provided those families with bottled water, just like Flint MI. How will the local people and resources be protected?
16. How will flight fuel dumping be avoided within EBLA?
17. Given the potential devastating impact to the residents of Whidbey Island, the public should have a 45 day comment period after the Final EIS is published.
18. As a Vietnam Veteran I recognize the need for military training, but it should not come at the expense of the citizens the military has sworn to protect. The OLF overflights are physically and mentally harming people. It is extremely saddening to see the impact the noise has young children

trying to study, play, and sleep. This EIS does not accurately reflect the real world noise, flight paths, and devastating impact of the Growlers at OLF and the Northwest Washington State area.



Coupeville, WA 98239

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 Retired public school teacher

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

- 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
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- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
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- 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

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.
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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.
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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.

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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:

We experience and are routinely exposed to and startled by excessive blasts of loud noise from Growler over flights from NAS Whidby. Our lovely waterfront home is decreasing in value due to this. Adding 35 Growlers which train over S. Lopez Island will make it an unlivable place.

Coupeville, WA 98239

1.a. Thank You
14.a. Transportation Impacts
2.I. No Action Alternative

I'd like to start off by saying thank you for the opportunity to comment on this EIS regarding training operations at NAS Whidbey Island Complex. I currently live in Coupeville, specifically in one of the areas of highest impact. I have been working and volunteering in the Fire service for several years. As someone who has trained for life or death situations and contingencies, I feel I have a well-developed understanding of the importance of proper training. There was a quote painted on the wall of one of my fire houses that said "Let the ghost of no man return to say his training let him down". This has stuck with me throughout my education in the fire service. I wholeheartedly believe that the pilots and aircrews serving their country at NAS Whidbey Island should have the best possible training available. However, there are a few issues with the data that has been presented in your EIS. The lack of consideration of a "No Action" alternative is a disregard for the due process that is a part of this system. Compromises are supposed to be put forth and considered, and the fact that this has been ignored in this case is irresponsible. I do not believe that the conclusion of your EIS is accurate. It fails to take into account the true volume of people who either pass through central Whidbey Island or live and work here on a daily basis. State route 20 is a very busy section of highway, and the number of commercial and personal vehicles that pass through it daily deserves to be considered. It is my understanding that a place such as this simply can not support the actions put forth in your EIS. It is worth considering another area where the impact would not be quite so concentrated. Thank you for the opportunity to comment and be a part of this process. I hope to see an alternative where the communities of Whidbey Island and the United States Navy can continue to work together in partnership. Regards, [REDACTED]

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 NA

3. Address _____ Lopez Is 98261

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
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.a. General Noise Modeling
- 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.p. Sleep Disturbance
- 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

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:

On a nearly daily basis we are being rudely assaulted with loud rumbling and roaring of "the sounds of war" generated by Growler planes(jets).

(Continue on the back)

flying directly over our house at Mackaye Harbor on the south end of Lopez Id. The sound is deafening and very troublesome; waking us from sleep, interrupting conversations and daily activities. It is hard to endure the long hours of low frequency rumbling which penetrates walls and windows. Summer activities on the terrace overlooking the Bay are frequently totally disrupted!! The navy has not demonstrated that there are no health impacts from Growler noise, yet I feel it's definitely affecting my mental health and physical health. The navy needs to perform low frequency noise studies from Growlers and recognize their impact on health!!

We moved here 27 years ago for peace and quiet and the tranquil lifestyle. We coexisted with NAW and the prouter jets which were much quieter.

An increase of 50% more Growlers training will be unbearable! The air corridor needs to be expanded and spread the noise over a wider area. Thank you!



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 [REDACTED] B&B

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

We are not opposed to Navy Performing FCLP's at OLF but we are very concerned about the significant ~~flight~~ increase in number. Coupeville is very tourism oriented especially in summer months with lots of B&B's in the noise zone. We run a B&B on [REDACTED] Rd within town limits and are consequently under the OLF departure flight path. Summer time flights & particularly night FCLP's really affect our business. This past year, the Navy has been relatively good about avoiding use of OLF on weekends but with the increase proposed, it will negatively affect the tourist oriented businesses like B&B's etc. We hope the Navy will continue to avoid late night & weekend FCLP's particularly in summer months.

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

Coupeville, WA 98239

- 1.a. Thank You
- 12.h. Tourism
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.t. Noise Mitigation

Dear Sirs, Let me start off saying that I understand the need for FCLP's and the need to balance training with community concerns. I am not opposed to FCLP's at OLF Coupeville but I do think the Navy needs to understand that Coupeville is a very small town with a heavy dependance on Tourism particularly in the summer months. Coupeville hosts many events & festivals in the April thru September time frame and an increase in FCLP flights at OLF with pattern entry or departure essentially flying right over Coupeville will negatively affect the tourism business that the town and it's businesses depend on. There are many B&B's in and around Coupeville that are all within the noise zone so an increase in night time or weekend FCLP's during summer will certainly chase guests away or cause those that do stay to write negative reviews about their holiday experience. For this reason, I would like the Navy to be more flexible with the proposed 80/20, 50/50 or 20/80 mix of flight ops between OLF & Auld Field. Perhaps flight ops, particularly night time, can be more heavily weighed toward Auld Field in summer months and then switched to OLF in winter when tourism is very low. The quant shops, restaurants and B&B of Coupeville all depend on summer tourism whereas Oak Harbor is much less affected FCLP ops in summer months. Please consider the community business affect not just the health and safety aspects of FCLP flight ops. Thank you for your consideration, [REDACTED] Coupeville, WA
[REDACTED]

Coupeville, WA 98239

I appreciate this opportunity to comment on the Draft EIS for continued and increased Growler operations at NASWI. I am offering these comments as an individual resident of Coupeville (outside town limits), in an area that I learned from the Draft EIS is between the 65-70 DNL contours and therefore subject to noise exposure that is significant enough to warrant land use controls. I would like the following addressed in the Final EIS: The proposed action analyzed in this Draft EIS is a response to a situation in which Congress, without a request from the Navy, provided funding to expand the Growler fleet without appropriate analysis of need or impact. As a result, many people are now facing an equipment-driven proposed action that will have a "Significant Environmental Impact" on a community and the resources, lives and economy it encompasses. The Draft EIS does not fairly examine all alternatives and scenarios. The lack of real consideration of a "No Action" alternative, and the decision to analyze only alternatives that will have a "Significant Environmental Impact" reflects the "after the fact" nature of this analysis. The ranging percentages of operations apportioned to OLF versus Ault Field are arbitrary and show no analysis or functional basis or threshold. The proposed numbers of operations are based on numbers of planes that need to be based at NASWI, instead of analysis of human or environmental impact. In several cases, the data and analyses presented in the Draft EIS have minimized assessments of impact. One example is the position, disputed by the Washington State Department of Health and others, that there is no scientific data linking noise exposure and adverse impacts to public health. Other examples include: using outdated data to analyze the impact of noise on outdoor recreation users; failing to discuss and compare the noise modeling reported in the Draft EIS with a recent, scientific, on-the-ground noise monitoring study by the National Park Service; presenting an incomplete consideration of cultural resources, which are important to this community; and most importantly, relying solely on the DNL noise modeling method to determine the extent and severity of significant Growler noise impacts, when this method is questioned by many who feel it does not accurately represent what people experience on the ground. Because they could be disproportionately impacted by the Growler expansion, the Final EIS should give more consideration to the role that rural character, outdoor recreation, heritage and ecotourism, viable agriculture, heritage preservation and land protection play in Coupeville and Central Whidbey Island. The Final EIS should acknowledge the strength of traditional land use patterns and distinct socioeconomic characteristics of Coupeville and Central Whidbey, including those of Ebey's Landing National Historical Reserve. It is a major omission that the Draft EIS does not disclose to the public the boundaries and detailed implications of an OLF APZ. As a result, property owners were not informed or given an opportunity to comment on how this will affect their property and lives. The Final EIS should disclose the boundaries and implications of the APZ, and the Navy's plan to avoid or mitigate this action, which will trigger local land use regulations, impact property values, and affect people's use and enjoyment of their own property. The Final EIS should consult with the Washington State Department of Health and report on current scientific data concerning jet noise and public health. The Draft EIS does not give adequate consideration to pollution. The public needs to know the Navy's plan to analyze risk and ensure that the public is protected from the pollution and contaminated groundwater caused by their operations. How did the two major groundwater pollution

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.n. Quality of Life
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.l. No Action Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 7.g. Ebey's Landing National Historical Reserve

incidents now known (the "plume" and the PFOAs) happen? How were they overlooked and not disclosed for so long? How can the public protect itself from Navy operational mishaps? How can local specialized agriculture continue with a contaminated (or bottled replacement) water source? What is the Navy's commitment to making sure the local citizens and local government will not bear the costs of cleanup? Because of the extreme importance of this decision to our community, the Navy should ensure a 45 day public comment period after publication of the Final EIS. Like most people in my community, I respect the Navy, its mission, and especially its good people who are our neighbors. However, the noise and other impacts from the extraordinary expansion and concentration of the Growler operation to the levels presented in this Draft EIS are not tolerable or sustainable and will create serious, endless conflict. Navy and elected leaders are aware of more reasonable alternatives (like spreading Growler operations among different locations) that were omitted from this Draft EIS analysis. These options should be considered.

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



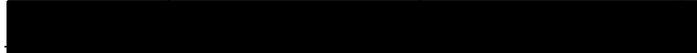
3. Organization/Affiliation Retired owner



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
- 11.d. Per- and Polyfluoroalkyl Substances
- 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
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 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

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 Navy is degrading the values we treasure - the reason we moved here thirty years ago: clean water and air, peace and quiet. Placing a War Training zone over the pristine San Juan Islands and recreation areas does not help our economy and it is harming thousands of marine animals through the dumping of toxic compounds.

Our home values are declining due to the intrusive noise of Growlers!



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

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 own a construction company and am used to noise, however, when a Growler flew over our home recently - while in the shower, I thought there was an earthquake with the shaking and numbing - loud!

The Navy needs to evaluate the low frequency noise generated by engine testing and flight landing practice. The Navy needs to do a specific noise study on Lopez Island.

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.r. Nonauditory Health Effects

Written summer of 2013 in response to people saying just move....

The noise disclosures should state the reality of buying real estate in flying zones. There should be a warning that you will be exposed to decibel levels that have been shown to cause hearing loss, mental agitation, and other health issues. Your quality of life will be affected and the ability to be outside on your property will be hindered unless you are wearing hearing protection. That will be a great selling point for everyone that lives in these zones currently and wants to sell their homes. The current noise disclosures are vague and use words like may or might they do not state factually the true reality of how your life will be disrupted by investing in real estate in these areas. The Growlers have changed the dynamic whether it is frequency or decibel exposure there are negative impacts due to their presence here. For home owners purchasing before their existence here you would have not known their impact. I am so discouraged by the lack of compassion some community members have exhibited towards all the individuals that are experiencing the consequences of the Growler flying over their homes. Maybe you can visualize a two year old that cannot play outside because when the planes fly over she covers her ears, cries and verbalizes that her ears are owwie. This is not an us against them, how patriotic you are, or having well trained pilots issue. These planes are causing harm to American citizens living on this island we call home and there needs to be a solution found. I have read over and over again "then just move". I have lived and contributed to this community for over twenty years, raised my children, and experienced the death of a child here. I know the goodness, kindness and support this community can give it is that spirit that makes Whidbey island a blessed place to live. Witnessing now a community divided and the lack of empathy towards each other is discouraging. To know this community would not tolerate their neighbors being harmed and would have fought tooth and nail to rectify the situation is no longer a true statement means this issue has changed the core of who we were.

██████████

██████████

- 1.a. Thank You
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 15.b. Potable Water and Wastewater Capacity
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 7.c. Noise Disclosure
- 7.d. Recreation and Wilderness Analysis and Study Area

I am mentally , physically ,and spiritually defeated today. In the last twenty four hours I have received news that I am going to be a grandparent again and that I am suffering from a severe case of diverticulitis. The first should bring me joy and the second I was told to go home and rest. Neither is an option because of the Growlers, they are flying again today...

I think they must be flying at OLF today but that does not mean a reprieve from the assault of their grumbling house shaking noise because I live on the north part of the island. We are exposed any time they take off and land. I grieve for what this island used to be and the wonderful life we had raising our children here. My husband is a Navy veteran and I was proud to be part of the NAS Whidbey community the planes were never something I felt infringed on our lives. The Growler is a whole different ballgame. Before when relatives from out of state came to visit and the planes flew over I would just say " it is the sound of freedom " and I meant it. I now apologize to my relatives before they come and warn them that the planes may be really bad while they are here.

I sit here today knowing that in this equation myself and those that I love are expendable. I have attached a video of a Growler flying over my son's home now imagine that happening over five thousand times a year ! We could all pack up and move especially with a new baby on the way .One that I cannot protect from the planes flying over their home or mine and my daughter's. Of course none of us could sell our homes for what we purchased them for now that the secret about the impact the Growlers are having on this community is apparent. So anyway just a little glimpse into my life. May you enjoy your holidays and time with family and friends and I will do my best to do the same.

The following was written over a year ago ...

I have lived in Oak Harbor for twenty two years. The sound of planes has been part of living here and until this past year had not impacted daily living or the ability to be outside. The glorious summer we had in 2013 consisted of weeks where the planes were flying twelve hours a day with what appeared to be small breaks every two hours. I have never experienced the planes flying so low I could tell you the color of the pilot's headgear ! I watched my grandchildren hold their ears and jump on to my lap it was devastating and frustrating that we needed to go and stay inside. Forget about playing in the pool, riding a bike, shooting hoops or enjoying the outside play set. My son and his family bought a home on Wilson road this past spring within a month their two year old daughter was not sleeping through the night and experiencing night terrors the planes fly about one hundred feet above their tree line.

There were observed major changes this past year concerning both planes (Growler, Prowler).

- the amount of flights.
- lower altitude. WHY ?

I went to the scoping meeting in Oak Harbor and could not get a direct answer on how the sound levels are going to be measured ie: actual real time decibel readings in impacted areas or if they will only use the NOISEMAP program. I WOULD CHALLENGE DECIBEL LEVELS TO BE RECORDED IN REAL TIME AROUND THE WILSON AND SLEEPER ROAD AREA.

NAS Whidbey is located on an island for some reason I think this is important. The Oak Harbor area is currently dealing with issues concerning the capacity to provide water and sewer needs to the current population. The Navy's response to contributing to a new sewer treatment plant was a resounding maybe we will. The booklet given out during the scoping meetings estimates bringing in two squadrons will bring in 860 additional personnel and 2,000 plus family members. There is not enough military housing to accommodate that amount which means they will be living in the city of Oak Harbor utilizing the current infrastructure. Issues that need to addressed in EIS concerning impact to the island and specifically the City of Oak Harbor.

- Sewer capacity
- Water
- impact on classroom sizes in the Oak Harbor school district.
- Fire and Law enforcements ability to respond.

I hope and want to believe this EIS will be completed before the new squadrons arrive here , but when money is being appropriated in committee presently and our local politicians are receiving accolades I tend to feel like it will be a bunch of smoke and mirrors because the squadrons will be here before the completion of the EIS and as community member I will know that the quality of life for myself, family, and friends is of no consequence and that really saddens me.

██████████
██████████
Oak Harbor , Washington

P.S. I have also attached a writing that I did months ago to help alleviate the stress I was feeling.

Can you say Growl !!! Would love to sleep and not be in a state of anxiety .. but I am one of those stupid people that bought property before they were here and now I should be killed by the people "they" are protecting us against .. Just to quote others comments and bumper stickers... Wow !!! Amazing what a supportive community I believed I used to live inThere was a point of time in my life where people helped someone get through the unimaginable events in their life here in this community , now I am told to just move... Compassion and empathy have left the building ... It is now midnight and the Growlers have been flying for hours (06/26/2014) and for the previous months. I feel like I am going to break down.. How sad it is to think that I live with this on a daily basis and my only choice will be to move and leave where I have been for over 20 years because myself and my family are expendable in this equation. I wanted to post this to facebook but live in fear of my well being in expressing my opinion in any public setting due to what have been threats made by people in this community towards any of their fellow members that are having their lives disrupted by these planes and dare utter that their homes have become a place of sensory disruption and despair.

6/26/2014

██████████

██████████

Holding your Breath

I held my breath when

my son died .

given a diagnosis of breast cancer.

my grandchildren were born.

Devastation... Joy... Anticipation... Anxiety

The full range of emotions where I have to remind myself to breathe whether it be for a moment , a day or for years. They are the times that you have no control over the situation or event. I now spend my days holding my breath because of a plane. Every morning waking up and waiting to hear the noise and feel the vibrations inside my home. Once it begins I wonder will this be for a few hours or all day and into the night. What plans do I have for the day I now need to change because I cannot be outside . Should I put on music and turn up the sound loud enough to drown out the roar of the engines. I look out at the pristine sky and look at the vapor trails behind the planes and wonder what has been falling from the air to the ground. What am I being exposed to ? Then I remember my grandchildren and the worry begins ... What is this doing to them ?

I do not expect in my wildest thoughts that there are not going to be Growlers here at NAS Whidbey. We are talking about touch and go's one of the most dangerous operations as part of the Growlers training. They fly low and loud during these exercises over areas populated on a ISLAND . There is only a limited amount of land where can you go to escape the constant onslaught of noise.

SO I WILL CONTINUE TO HOLD MY BREATH AND TRY TO REMEMBER TO BREATHE.....


Community member living north of Oak Harbor

8/25/2014

- 1.a. Thank You
- 1.d. General Project Concerns
- 12.j. Property Values
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

It was fall of 1991 and we had chosen Whidbey Island as our next duty station. My husband had spent summers here fishing at Bush point with his grandfather. I was looking forward to arriving in this incredible place my husband had described. When we arrived here there was only a stop sign on 20 from Ft. Nugent. We had three small children and I so looked forward to raising them here. It was a community that cared for one another and the nature to explore was magic.

We raised our children in Oak Harbor always grateful this was the childhood they had and the values instilled in them living here. We were overjoyed as parents that they chose to stay close to home when they became adults. This would be our saving grace when our youngest son died in 2009. We had each other and all our friends that felt like family as well as a community that reached out to us.

We have worked hard and sacrificed to finally purchased our forever home on Taylor rd. with acreage in 2006. The prowlers were flying then and our lives were not disturbed by their flying. We began to notice what I described as pointy planes around 2011 they were Growlers . We were clueless that they would become the symbol of our " American Dream " disintegrating.

I have reached a point that I cannot live out the rest of my days here and keep experiencing the trauma the Growler has inflicted on my life. My husband is not ready to sell . He works away from here 75 % of the year so he is not as exposed to the sound as I am . I think even more this home represents his hard work numerous year he missed with our family as he provided for us.

My choice is to find somewhere to live off this island this entails getting a job somewhere else. We are talking about a 30 year marriage. This does not even take into account that I am the babysitter to my granddaughter's that I made the decision to move my 75 year old dad here from Utah because he did not have anyone to help take care of him. I will have to figure out how to financially make it possible for me to live off island come take care of my granddaughters , father and be home with my husband. I will not have the support of friends I hold dear either... The Growlers will be the cause of fragmenting a family that have experienced more trauma than many could imagine ...

To not acknowledge that there is not a problem with the Growler is choosing to accept that harm is being caused to fellow human beings including children and can be ignored. The number of flights, the noise level which causes prolonged anxiety, sleep deprivation and stress on the body. I am so grateful that after our son died they were not here. I could not have physically, mentally and spiritually recovered. Trauma throws your system into utter chaos and the jets do not stop long enough many weeks out of the year to take a breath and recover.

I have spent the last three years first at my own home not being able to be outside and when they are flying until 2:00 am not getting sleep. Then as a mother to protect her children and grandchildren. I sit helpless because I know my son and his family who live on Wilson our experiencing torture at their home where the Growlers turn on full afterburners while practicing FCLP. They experience sleep deprivation and this is a couple that both work early and have school aged children. Our youngest son died because he fell asleep at the wheel it is called micro sleep. You can't tell me not having enough

sleep has no consequence it can take away what is most precious. Our oldest granddaughter is 12 and has described that the jets and now other high pitched noises cause her ears to start ringing. Their middle daughter has arthritis she is only five and out next option of treatment is to give her a low dose chemo drug once a week. Her poor little body needs rest. The physical and emotional toll of trying to process out the noise and the full body vibration the Growler causes will only accelerate her disease. my so feels trapped . In good conscience he could not sell his house and know another family would be impacted like his has been and will continue to be.

I have survived so much in my life but the disregard for what myself and family are going through is like living in a war zone. I personally cannot stay here and survive it. The Growlers have single handedly taken away all I have worked for, changed my belief system that our elected officials care and the pride I used to feel for the place I live in and for my husband that served is gone. I and my family are expendable in this equation and that I cannot live with.

██████████

██████████

8/15/2016

Oak Harbor, WA 98277

Here I have compiled some comments in regards to the expansion of the EA18G Growler influence at Naval Air Station Whidbey Island. The presence of the Growlers have thus far negatively impacted many aspects of my life and those whom I love and am responsible for. These aspects include my home, my day to day life, sleep, and my community. I live on the North end of Oak Harbor. When my husband and I first visited our property we cried with joy. After a few years away from the island we finally felt HOME. Our dream has dissolved. Sadly, we search for new homes often and always on late flight nights. We had not experienced and FLCP until OLF was closed. That night I was in a panic thinking something awful was happening. I called the base and they let me know everything was alright, it's just the sound of freedom, the planes are practicing FCPL's. The sound and rumble at my home during FCLP's feels and sounds like the world is being shredded around us. I feel on edge because supposedly it's unsafe where I live. This was clearly not explained at purchase that THIS situation could be happening to us. I can barely stand being home when the Growlers are flying. Which begs the question, if I can't handle it being a Navy Bratt by both parents, growing up on military bases, how would someone else. I tell myself like a good little sheep I can deal but No! This is impossible, it's too much. My kids hate that they can't be outside. Phone calls/general conversing are impossible when the Growlers are doing FCLPs. I swear my wife ALWAYS is intermittent if they are doing their war games. Playing outside, gardening, and yard work are all impossible. Day to Day life becomes hard when FCLPs are being conducted all day, all night, or both. When FCLPs are occurring simple gestures like relaxing, parties, enjoying an outside meal, or even calling for a child are hindered. Children don't want to spend the night at my house because the sound of the jets is terrifying and painful. This is super hard on my children. It is impossible to escape because our beaches and state parks are experiencing the same issue as my home. We used to eat dinner at the parks often in the summer but became frustrated with the fact that the state parks are polluted with the Growler roar. I have been driving down the road and startled by the terrifying scream when I was least suspecting it. I have been around a few ambulances that their sirens were completely masked by the jet noise. Both were extremely worrisome situations. When inside my home while FCLPs are being conducted there is an overall sense of chaos that intensifies day to day stress. Caring for a larger family has its normal challenges but it's magnified when everyone must be heard, your body is in alert mode due to the rumble that your body feels, or you can't fall asleep. Sleep deprivations during the school/work week is a struggle. Late, loud nights are terrible on my family and life. We are irritable which makes normal growing pains seem harder. I work in a detail oriented profession which good sleep and being alert is imperative. I become frustrated and things seem worse. My work is affected because I serve the pilots and their families on a daily basis. They are lovely and I am quite close to a few. I support them. I cannot however support them conducting FCLPs on Whidbey Island. My boss doesn't understand my struggle and pain which brings question to why I am fighting to stay here. I live day to day in my home feeling unsettled. My husband wants to move away from a community that turns its back on its citizens when there is a real problem here. There is a real issue bubbling in our community. The fear of talking about any jet noise complaints was reinforced when the Health Department of Island

- 1.a. Thank You
- 12.j. Property Values
- 12.n. Quality of Life
- 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.m. Record of Decision/Preferred Alternative
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 7.c. Noise Disclosure
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.i. Deception Pass State Park and other State Parks

County made it so the issue could not be brought up at meetings. It is also disheartening that the Island county commissioners denied a grant for a Recreation area in Coupeville that everyone who comes to the island would use and is in desperate need of stating that they were ANti Navy. This is unacceptable. The Growler noise is a real issue to our health! The Anti Navy label is not fitting in this case. The Anti Navy stigma feels like bullying to me. I can't believe that the dangers associated with the health hazards created by the Growlers can be belittled and denied just so pilots can have a sense of a normal life by practicing on Island. I believe there has to be a new EIS. There needs to be more hard data collected and less computer generated averages. My daughter's school already is interrupted often enough that I become so upset when visiting the class room. They can not have anymore. There has to be a change. That change will either be I remove my family from this situation or the Navy or State will listen to the cries of anguish and frustration from its citizens. FCLPs are a maneuver that is intolerable to humans and animals near by. I feel like the FCLPs are hurting so many emotionally, financially, physically, and mentally. There must be another solution to this issue. I want to raise my children in the community I grew up in and support. I don't want to be pushed out of my home. I beg of you to move FCLPs to runway nowhere near people and animals. I beg of you to not expand the Growler program. I believe the amazing quality of life that Whidbey Island has to offer should still be a possibility for my Family.

1.a. Thank You

Coupeville, WA 98239

Engine noise in Penn Cove is horrible. Many days this summer we were unable to sit outside. Please do not increase low altitude air traffic. This has been getting worse each year.

Port Townsend, WA 98368

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 OLFC 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. 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 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 Reasonable Alternatives: The Navy has not made a good faith effort to explore other alternatives as NEPA requires in 40 CFR 1502.14 (a). All of the Navy's 'alternative' scenarios will increase noise, harm to health, and other adverse

- 1.a. Thank You
- 1.d. General Project Concerns
- 10.f. Endangered Species Impact Analysis Adequacy
- 12.h. Tourism
- 18.b. Average Carbon Dioxide per Aircraft
- 18.d. Washington State Greenhouse Gas Goals
- 19.b. Revised Cumulative Impacts Analysis
- 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.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.g. Average Annual Day/Average Busy Day Noise Levels
- 4.p. Sleep Disturbance
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- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 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

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. 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 FCLP 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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Port Townsend, WA 98368

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 OLFC 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. 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 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 Reasonable Alternatives: The Navy has not made a good faith effort to explore other alternatives as NEPA requires in 40 CFR 1502.14 (a). All of the Navy's 'alternative' scenarios will increase noise, harm to health, and other adverse

- 1.a. Thank You
- 1.d. General Project Concerns
- 10.f. Endangered Species Impact Analysis Adequacy
- 12.h. Tourism
- 18.b. Average Carbon Dioxide per Aircraft
- 18.d. Washington State Greenhouse Gas Goals
- 19.b. Revised Cumulative Impacts Analysis
- 19.d. Electronic Warfare
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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

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:

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

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.

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Clinton, WA 98236

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1.a. Thank You

4.d. Day-Night Average Sound Level Metric

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

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

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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

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

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.

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

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.

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.

Medina, WA 98039

Being a part-time resident of the Olympic Peninsula, I have experienced the noise emitted as the Growler's race overhead. We retreat to the peninsula for quiet, hiking, and emersion in nature. To have that disturbed so often and so radically is a concern. Not only for us, who know what is causing the disturbance, but for the wildlife that will be panicked and the potential effect that may have, especially on sensitive species. In addition, and MOST IMPORTANTLY, are those that visit our cabin and the peninsula at large, suffering from PTSD. We have seen the discomfiting effect of military armaments booming at them out of nowhere. We appreciate the role of Growlers in the freedom we all enjoy. But please, can the buzz around way out at sea, or in the already-noisy cities?

1.a. Thank You

10.a. Biological Resources Study Area

10.b. Biological Resources Impacts

2.n. Alternatives Considered But Eliminated

4.r. Nonauditory Health Effects

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

7.d. Recreation and Wilderness Analysis and Study Area

1.a. Thank You

Fort Lauderdale, FL 33301

War is obsolete. It is past time that we place all our assets towards saving the earth,
water, air For the Children of church he world. When is enough enough

Auburn, WA 98002

The National Park system was established to "conserve the scenery and the natural and historic objects and the 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." Nothing in there about using National Parks and Forests for staging war games. The Navy's plan to conduct war games over and on the Olympic Peninsula poses a clear and present danger to the peoples, flora, and fauna of a unique landscape that our forebears believed needed to be protected and preserved "unimpaired" for the enjoyment of future generations. Temperate rainforests, such as the Hoh Rainforest, occur in only a few regions around the world. Species diversity is greatest in rainforests. We have a duty to ourselves and the planet to preserve this unique natural resource. Secretary of Defense Chuck Hagel said in 2013, "Climate change does not directly cause conflict, but it can significantly add to the challenges of global instability, hunger, poverty, and conflict. Planning for climate change and smarter energy investments not only make us a stronger military, they have many additional benefits – saving us money, reducing demand, and helping protect the environment." Each Growler 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 an average WA state citizen! Multiply this by up to 118 jets x 260 days a year 14-16 hours a day, at altitudes as low as 1000 feet. It 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.c. Wildlife Sensory Disturbance and Habituation
- 18.a. Climate Change and Greenhouse Gases
- 18.b. Average Carbon Dioxide per Aircraft
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area



Public Meeting Comment Form

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1. Name

2. Organization/Affiliation

3. Address Lopez Is. 98261

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

None of the Navy proposals address any of the noise concerns that exist on Lopez Island. I consider the Navy proposals to be essentially non-responsive

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.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives

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 _____ *LOGZ IS. 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

**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

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 from Growlers is deafening
It impacts humans & animals and
disrupts live in these islands. Having
listened to several nrg presentations it
is clear to me that the mission could
be done by drones which would not need
constant carrier training.*

1.a. Thank You

clinton, WA 98236

Please continue to fly the F-18 at the OLF. We love watching it and love the noise. More growlers equal more jobs and growth for Whidbey Island. Objectors can simply pack their bags and move. Thank you.

La Conner, WA 98257

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

While we have become accustomed to occasional jet noise our paying overnight guests have lost sleep with late night flights, which is not good for business. It was a huge disappointment to find the new Growlers are even noisier than the previous Prowlers. I am not in favor of additional jet noise. I suggest that the current noise level be mitigated through good exhaust engineering and ask that no additional jets (especially Growlers) be added to the fleet.



Public Meeting Comment Form

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1. Name [Redacted]

2. Organization/Affiliation *concerned & frustrated citizen*

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 to receive a CD of the Final EIS when available

In section 3.2 the EIS does not evaluate the low frequency noise impact of the growlers.

The weighted sound impact is not an adequate basis to assess the impacts of noise on humans.

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



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1. Name [REDACTED]

2. Organization/Affiliation concerned citizen

3. Address [REDACTED] Nopey 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 to receive a CD of the Final EIS when available

I am concerned about the impact of the noise & emissions ~~of~~ on the wildlife of the salish seas, in particular on the impact on our orca whale population.

A noise impact study needs to be conducted specifically addressing this issue.

Please print • Additional room is provided on back
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 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS
YOUR INPUT MATTERS

1.a. Thank You
 10.m. Impacts to Marine Species and Habitat

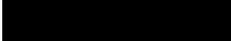
Draft Environmental Impact Statement for EA-18G "Growler" Airfield
Operations at Naval Air Station Whidbey Island Complex

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 Community Member with Concerns

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
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Operations at Naval Air Station Whidbey Island Complex**

January, 2017 Comments

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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.
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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.
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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.

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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 very concerned about the health impacts of the Growler operations on Whidbey. My husband, recently retired, is home more than I am & has anxiety & sleep issues related to the noise created, as do many other friends & neighbors. As indicated in statements above, I do not feel the EIS adequately addresses these impacts & I implore you to address these issues before taking any steps that would further intensify the noise.



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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

PLEASE SEE COMMENTS ON BACK -

I WOULD GRADUALLY SUBMIT OR PAY FOR NOISE LEVEL TESTS IF THAT WOULD HELP!

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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I LIVE ON THE SOUTH END OF Lopez Island
(HUGHES BAY). THE NOISE CREATED BY THE
FLIGHTS FAR EXCEEDS ANY NORMAL LEVEL
THAT A HUMAN BEING SHOULD TOLERATE. WHEN
THE FLIGHTS OVER MY HEAD IS SOUNDING, WE
CANNOT TALK ON THE PHONE, MY KIDS HAVE
FALLEN ILL AND MISSED SCHOOL, MY DOG HIDES
UNDER THE BED, MY HORSE HAS PANICKED AND
THE HOUSE SHAKES. I APPRECIATE WHAT YOU
DO BUT YOU ARE SUPPOSED TO PROTECT US
NOT CAUSE ENVIRONMENTAL DAMAGE. I HAVE
ASKED WHAT I CAN DO TO DOCUMENT AND
ABSOLUTELY NO ANSWER. AND NOW YOU PROPOSE
MAKE THIS WORSE! IT IS UNACCEPTABLE!

For more information, please visit the project website at whidbeyeis.com

Please print

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

YOUR INPUT MATTERS

1002860.0041 10

Whidbey 2016_Comment Sheet at GRA-6/23/16

Lopez Island, WA 98261

>In addition to the EIS comments below the constant and loud rumbling from the Growlers have caused me to have headaches and when our kids are home, complaints from them that they cannot focus. Flights at dinnertime are so loud that we cannot have conversation at the table. EIS 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. 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

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.n. Speech Interference (Indoor and Outdoor)

4.r. Nonauditory Health Effects

4.t. Noise Mitigation

7.h. San Juan Islands National Monument

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.

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] *Freeland, WA 98249*

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:

Our property assessment in the Admiral's Cove Area has been reduced by 25% in last years assessment. Our property has been on the market and like many others in the area, there is very little interest from buyers, while most other areas are increasing in value. We suspect the decreased values are related to the increased flight operations and noise from OLF as well as the new revelation of contaminated ground water. Please address the very real economic issues in your study.

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

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

1. consider environmental impact of FCLP on off-Whidbey Island sites 2. consider impact of noise levels above 84 dB peak levels (DNL averaging makes no sense, since averages out peak levels), sleep disturbance is severe health issue. 3. entire flight path during FCLP is at low altitude over homes, businesses, schools, etc, and is the most dangerous aspect of flight. possible bird strikes due to large birds (eagles, herons, hawks, falcons) in area. 4. consider water contamination due to fire-retardant foam 5. consider impact on tourism for town of Coupeville, Fort Casey state park , Deception Pass state park, Ebey's Landing Historic National Reserve.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 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

Victoria, British Columbia V8R 6P1

Living across the strait from Port Angeles we have over the years experienced the 18G Growler noise and have not complained until now. The noise from this aircraft is god awful, our home shakes, and one does not know if it is an Earthquake, can you not aim the noise elsewhere away from the south end of Vancouver Island. There are times when we can't even hear our TV or those who may be here for a visit. We really do not wish to experience more aircraft of this type and the noise it carries with it. Thank you. Future updates when you solve the problem.

1.a. Thank You

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

4.n. Speech Interference (Indoor and Outdoor)

Freeland, 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, 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.

, 98249

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

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

, 98249

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.

1.a. Thank You
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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

Freeland, WA 98249

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Freeland, WA 98249

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

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
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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
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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 analyzed.

Freeland, WA 98249

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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

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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.

Freeland, 98249

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

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- 11.d. Per- and Polyfluoroalkyl Substances
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- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.c. Noise Disclosure

Freeland, WA 98249

The Navy Needs to Hear from ALL of Us! Here's what you can do to help Be Heard. Comment Deadline is January 25, 2017. Here's How in Five Easy Steps: 1. This is the Navy's draft EIS comment page. Copy and paste into your browser: <http://whidbeyeis.com/Comment.aspx> 2. Fill out the form (name, etc.). Under Agency/Organization put: "Abused Citizen of the USA" 3. Cut and paste one comment from below into the comment box. 4. Hit Submit. 5. Repeat one comment at a time for as many or all of the comments below. Re #2, if they tally by agency/organization, we want that group to show up. Re #5, that the more individual comments on a given subject the more weight they must place on that concern or problem area of the draft EIS. Note: if you prefer to send written comments via the US mail, send them to: EA-18G EIS Project Manager, Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS, 6506 Hampton Blvd., Norfolk, VA 23508

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smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss. Citizens of Ebey's Reserve <http://citizensofebeysreserve.com> Copyright © 2016 Citizens of the Ebey's Reserve Citizens of the Ebey's Reserve P.O. Box 202 Coupeville, WA 98239 Related info: <http://westcoastactionalliance.org> And a great one on the quietest square inch in the U.S. (not for long): <https://www.outsideonline.com/2000721/welcome-quietest-square-inch-us>

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.

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Freeland, WA 98249

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CHILDREN ARE OUR FUTURE! 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.

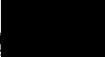
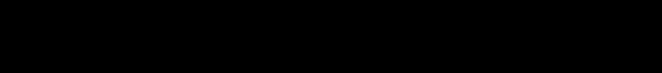
Draft Environmental Impact Statement for EA-18G "Growler" Airfield
Operations at Naval Air Station Whidbey Island Complex

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
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
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- 1. First Name 
- 2. Last Name 
- 3. Organization/Affiliation *Lopez Community Land Trust
Lutheran Church in the San Juan*
- 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

**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

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.
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Action: Redo the noise simulation using the more recent Advanced Acoustic Model.
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Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.

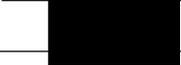
Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

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.f. Use of Public Comments
- 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.n. Speech Interference (Indoor and Outdoor)
- 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 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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Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.

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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 want the Navy to ~~follow the~~
abide by the same laws that everyone
else has to. The Navy growler noise
disrupts conversations while everyone has to
stop and wait for them to pass. No one else
would be allowed to do this.

Also, the Navy has a big PR problem here. It is
generally perceived to do whatever it wants, bc it
01/08/16 www.QuietSkies.info
underwater noise, atmospheric noise. It is not interested
in accomodating civilians or marine animals.

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

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

La Conner, WA 98257

The noise level today from the jet fly overs is horrendous. An increase in the numbers of fly overs will make things unbearable. The noise rattles our windows and causes us headaches and hearing loss. At times it is so loud it is deafening. The noise each time there is a fly over scares my pets and if they are outside I have to go search for them from being scared away. Please do not increase the number of daily flights -but if you do not listen the people who live here that at least do not fly over our homes - please just go out to sea. We live and work here and ask that you be good neighbors. Thank you for extending the comment period 30 days and I ask that you provide a 60 day comment period post the final EIS decision.

- 1.a. Thank You
- 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

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Operations at Naval Air Station Whidbey Island Complex**

January, 2017 Comments

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12. Add your own comments here:

The former jets at Whidbey (the growlers), were tolerable, The GROWLERS are not. You can't live without feeling like your zone some days & nights.

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

January, 2017 Comments

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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

Anacortes, WA 98221

The current Growler jet operations are too loud and are disrupting our sleep patterns. We are very concerned about a large increase in the Squadron size and its effect on our lives. Please do all that you can to modify the times of your operations and the way that they are conducted to minimize your impact on our lives

1.a. Thank You
12.n. Quality of Life
4.p. Sleep Disturbance
4.t. Noise Mitigation

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Operations at Naval Air Station Whidbey Island Complex**

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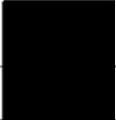
The noise at our home at the southend
of Lopez Island is beyond any noise & vibration
of former Navy jets from Whidbey.
We cannot rest or sleep - let alone
have peace that we moved here for.
We have lived on this property for seventeen years.

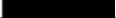
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Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

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Norfolk, VA 23508

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1. First Name [redacted]
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- 12. Add your own comments here:

More growlers filling our skies will destroy the very important quiet of the San Juan Islands. The noise pollution damages the lives of everyone, as well as on animals, especially birds.

Langley , WA 98260

I oppose the expansion of Whidbey Islands Navy base. Too much noise and pollution, our ecosystem here is very fragile and cannot support a company the size of the navy. Our groundwater has already been contaminated by them. The Navy is destroying our right to clean air and water and peace.

1.a. Thank You

11.a. Groundwater

11.d. Per- and Polyfluoroalkyl Substances

6.b. National Ambient Air Quality Standards Compliance

Langley , WA 98260

- 1.a. Thank You
- 13.a. Environmental Justice Impacts
- 4.r. Nonauditory Health Effects

I oppose the expansion of the growers in and around Whidbey Island. The noise and pollution are bad for our health and the environment. Relocate!



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

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

We do not need more noise & pollution on Whidbey Island & the Puget sound region. Our area is too populated to have this much noise. Please move your base to an unpopulated area. We live in a small environmental area that is very fragile, it will suffer more with additional jets. I feel that I should not have to fight for having clean air, water &

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.n. Alternatives Considered But Eliminated

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peace & quiet. It is my god given right !!
the Navy & now its expansion is
threatening all these things.
Stop it now !!!

For more information, please visit the project website at 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

Victoria, British Columbia V8N 1Z5

Dear Growler Managers, I am a resident of Victoria BC, living on the shores of Haro Strait. Please limit the amount of Growler flights training in Washington State (Whidbey Islan) ! The noise from these flights rattle our house and frighten our children. ALthough we are not in the USA, we share the skies. Thank you, [REDACTED]

1.a. Thank You

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

4.r. Nonauditory Health Effects

Navy Draft EIS comments
November, 2016
NAS Whidbey

Prepared by [REDACTED], MD
Anacortes, WA 98221
[REDACTED]
January 10, 2017

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

The following comments are addressed to the U.S. Navy Environmental Impact Statement (EIS) draft issued November, 2016 regarding a proposed action of adding additional EA-18G Growlers and increasing Airfields Operations at Naval Air Station (NAS) Whidbey Island and OLF Coupeville.

I have been a physician (MD) for 46 years. My training includes Internal Medicine, Aerospace Medicine, Acoustic Sciences and Medicine, Anesthesiology, and Critical Care Medicine. I served as a Flight Surgeon in the Navy for three years and was responsible for the health, safety, and hearing conservation of Navy and civilian personnel. All comments are based on my experience as well as scientific studies or references to scientific journal articles.

I have lived in Anacortes since 1985 and have experienced the Naval aviation presence for over 30 years. I have attended previous Scoping and DEIS comment periods involving Prowler and Growler flight activity at NAS Whidbey and OLF Coupeville.

I have included multiple areas of concern that I believe should be addressed in this EIS. I have discussed these issues extensively with many members of the community and have found strong support.

I have no issues with the mission of the US military. I have proudly served in the U.S. Navy myself during a previous war. My thoughts and comments are merely concerns for the safety and welfare of the total community relative to Naval flight operations at NAS Whidbey.

1. The Environmental Impact Continues to Increase

There are still residents of Whidbey, Fidalgo, Camano, and Lopez Islands who lived here prior to any naval aircraft operations at NAS Whidbey. These people can and have attested to the significant impacts that have occurred due to naval aviation operations over many years.

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.l. Points of Interest
- 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
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones

Prior EIS reports regarding flight operations at NAS Whidbey identified significant environmental impacts on civilian communities by flight operations emanating from Ault Field and OLF Coupeville. These impacts are discussed below.

In this EIS, additional Growler aircraft are proposed to be stationed at NAS Whidbey. Flight operations are projected to increase 46-47% (p. 10) and FCLP operations could increase 140-475% (p.72) depending on the scenario. These changes will impose further significant harm to the surrounding communities in terms of accident potential, noise, annoyance, sleep disturbances, communication interference, and potential health effects as discussed below.

Indeed, the authors of this EIS state:

“Overall, Alternative 1 would have significant noise impacts in the communities surrounding Ault Field and OLF Coupeville. Both the total number of acres and the total number of individuals within the DNL noise contours would increase for all scenarios analyzed. There would be a larger impact to the communities around Ault Field under Scenario C, while there would be a larger impact for the communities around OLF Coupeville under Scenario A. There would be a slight increase in the number of incidents of indoor and outdoor speech interference, and classroom interference. There would also be a higher probability of awakening under all scenarios, especially for POIs located closer to the airfields. In addition, depending on the scenario, the population potentially at risk for potential hearing loss would increase. The range of potential NIPTS could be up to 9.5 dB at Ault Field and 7.5 dB at OLF Coupeville for the population with average sensitivity to noise and up to 18.0 dB at Ault Field and 15.0 dB at OLF Coupeville for the population highly sensitive to noise.” (p. 338)

“Overall, Alternative 2 would have significant noise impacts in the communities surrounding Ault Field and OLF Coupeville. Both the total number of acres and the total number of individuals within the DNL noise contours would increase for all scenarios analyzed. There would be a larger impact to the communities around Ault Field under Scenario C, while there would be a larger impact for the communities around OLF Coupeville under Scenario A. The number of incidents of indoor and outdoor speech interference and classroom interference would increase slightly. There would also be a higher probability of awakening under all scenarios, especially for POIs located closer to the airfields. In addition, depending on the scenario, the population potentially at risk for potential hearing loss would increase. The range of potential NIPTS could be up to 9.5 dB at Ault Field and 7.5 dB at OLF Coupeville for the population with average noise sensitivity and up to 18.0 dB at Ault Field and 15.0 dB at OLF Coupeville for the population highly sensitive to noise (the 10 percent of the population with the most sensitive hearing).” (p. 368)

“Overall, Alternative 3 would have significant noise impacts in the communities surrounding Ault Field and OLF Coupeville. Both the total number of acres and the total number of individuals within the DNL noise contours would increase for all scenarios analyzed at Ault Field, and the total number of individuals within the DNL noise

contours would increase for all scenarios analyzed at OLF Coupeville. There would be a larger impact to the communities around Ault Field under Scenario C, while there would be a larger impact for the communities around OLF Coupeville under Scenario A. There would be a slight increase in the number of incidents of indoor and outdoor speech interference, and classroom interference. There would also be a higher probability of awakening under all scenarios, especially at POIs located closer to the airfields. In addition, depending on the scenario, the population potentially at risk for potential hearing loss would increase. The range of potential NIPTS could be up to 9.5 dB at Ault Field and 7.5 dB at OLF Coupeville for the population with average noise sensitivity and up to 18.0 dB at Ault Field and 15.0 dB at OLF Coupeville for the population highly sensitive to noise.” (p. 396)

Thus, this EIS concludes that all the proposed alternatives will significantly increase the impact on surrounding communities.

2. Average Noise Measurement criterion Ldn=65 is Inadequate

The use of average noise measurements as exemplified by the Ldn is useful for comparative purposes in some situation. Their use for aviation noise is limited unless special assumptions and criteria are used. There are several reasons.

First, the “Shultz synthesis” must be considered. Shultz collected data from many environmental noise studies and claimed to show a consistent relationship between Ldn and community annoyance. Based on his findings, several federal agencies have adopted standards of permissible Ldn levels for various activities related to highways, waterways, and airports.

Since Shultz originally published his synthesis in 1979, many authors have contested his findings. Griffiths¹ severely criticizes the methodology and hence validity of Schultz in deriving his annoyance curve. Bullen² cites Shultz’s use of a subjective verbal response, namely, “highly annoyed” in his synthesis. Using a linear, non-subjective scale, Bullen shows that Shultz underestimates community response to aircraft noise with his Ldn curve.

Hall³ criticizes Shultz for collecting his data 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. This agrees with a previous community study performed by FISE (Fidalgo Islanders for a Sound Environment) as discussed below.

FISE completed 5,578 hours over 261 days of noise monitoring in 14 communities during 1988-1989 when Prowlers were deployed at NAS Whidbey. Two Quest Sound Level Meters were utilized (Models M-27 & M-28). These are “level 2” sound meters that are certified and calibrated to standards traceable to the Federal Bureau of Standards. A PhD in acoustics trained FISE members in the instrumentation and supervised the project. The instruments record sound continuously for 24 hours and give hard copies of average noise as well as statistical distributions of individual events. Logs were kept at each site to record Navy flight activity and its impact on the residents at the site. (3,000 pages of data are available for inspection.)

The results of the FISE noise measurements are shown in Table 1. The Ldn exceeded 55 dBA in most communities studied. In two communities, Guemes Island and Campbell Lake, Ldn was less than 55 dBA yet both were significantly annoyed by the aircraft noise. For example, some residents around Campbell Lake found that the aircraft noise occurred at night (during summer months) and interfered with sleep. Even though Ldn was 53, the noise that occurred came at bedtime. One physician called frequently to complain that sleep disturbances threatened his functioning in early morning surgery at Island Hospital. Measurements made at the physician’s house showed loud noises at bedtime hours despite low noise averages (Figure 1).

In the current EIS, the authors show Ldn contours from 60-75 dBA. An example of one from page 318 is included in these comments (Figure 2.) Had the authors utilized the more realistic Ldn value of 55 dBA, wider contour bands would have occurred showing that even more of the surrounding communities are impacted.

3. Use Frequency of Maximum Noise Levels in Addition to Ldn

Some authors have disputed the utility of Ldn measurements compared to measurement of maximum noises. Both Borsky⁴ and Stephens⁵ show that maximum dBA readings are better indicators of community annoyance. Generally frequent maximum sounds of 70 dBA or greater correlate in a linear fashion with community annoyance. Results from the FISE noise studies show that three communities stand out with incompatible frequency of maximum noise occurrences: Coupeville, Shelter Bay, and Deception Pass (Table 2 & 3). At those locations, maximum noise frequently exceeds 90 dBA and often exceeds 100 dBA. Most other communities are seriously impacted with maximum noises often exceeding 70 dBA.

These findings are corroborated in the current EIS study as shown in multiple tables involving surrounding communities and Points of Interest (POIs) such as pages 323-324.

4. Use of Relative Loudness

Since Ldn adds a decibel penalty for noise between 2200 and 0700, it doesn't reflect the noise actually heard. The use of Leq and relative loudness obviates this deficiency. Leq is a measure of the noise actually heard and averaged over 24 hours. Acoustic physics have shown that for every increase in 10 dBA of sound measured the human hears a doubling in loudness. For example, 60 dBA is twice as loud as 50 dBA and 70 dBA is four times as loud as 50 dBA. For noise associated with intermittent events such as aircraft overflight, relative loudness changes that exceed a doubling are increasingly annoying to people. During the FISE noise study, Leq was measured during flying and no flying periods in all communities. These values are shown in Tables 4. Five communities experienced 2-3-fold increases in loudness during flying (Lopez, Shelter Bay, Oak Harbor, North Whidbey, and Oak Harbor). Three communities experienced intolerable increases in loudness with 3-8-fold changes (Rosario Bluff, Deception Pass, and Coupeville).

The authors of the current EIS would find greater annoyance among surrounding communities and POIs if they measured and plotted relative loudness values during flying and no flying periods.

5. Use of the Annoyance (AN) Metric

AN is a metric calculated by subtracting noise exposure that occurs 90% of the time at a location (L90) from the average day-night noise level for the same location (Ldn.) Hence $AN = Ldn - L90$. Research and usage has shown that AN predicts community response to aircraft noise as follows:

AN Value	Community Response
7	None
11	Sporadic Complaint
17	Widespread Complaint
26	Threats of Litigation
33+	Vigorous Action

Although this EIS did not make measurements enabling computing of this metric, FISE in its previous studies did (Table 3.) FISE's study showed that many surrounding communities had an AN value predicting widespread complaint, or litigation threat, or vigorous responses. In fact, Coupeville has responded with vigorous responses including legal injunctions, among others.

In this EIS, inferences can be made by looking at the Ldn contours shown in Figure 2 and assume that the L90 measurements previously made by FISE are still current (averaging 38 Dba, from Table 3.) Using these data, AN values will exceed 17-20 along western and southern Fidalgo Island, Northern Whidbey Island, Snee Oosh Road, Shelter Bay, La Conner, Fir Island, most of Oak Harbor, and a large area surrounding OLF Coupeville. Hence, all these communities may complain vehemently, threaten or file litigation, or resort to more extreme measures if any of the alternatives are implemented.

6. Health Effects of Aircraft Noise and overflights

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 a previous study reported by FISE, a community health survey from neighborhoods near OLF Coupeville revealed a high percentage of the 139 respondents reporting feelings of stress and illness requiring medical consultation, sleep disturbances, difficulties communicating with family members, and vibration of their houses and contents (Figure 3.)

It is time again to perform a similar survey to verify 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.

See reference numbers 6-44 for a list of significant medical articles documenting these findings.

7. Safety and Aircraft Crash Potential

This section addresses a primary concern of many citizens regarding the safety of operation of Navy aircraft in the vicinity of NAS Whidbey. The immediate area of NAS Whidbey includes overflight of three of the fastest growing counties in Washington (Island, Skagit, and San Juan), six major communities (Oak Harbor, Coupeville, Deception Pass State Park, Shelter Bay, Guemes, and Anacortes), and two oil refineries. In a previous evaluation, Navy data revealed that during flight operations around NAS Whidbey, 29 aircraft crashed between 1967-1990. Of those crashes, 11 occurred within 15 miles of Ault Field at NAS Whidbey. Within this 15-mile radius are located five civilian areas of concern.

(a) OLF Coupeville is a small naval auxiliary airfield surrounded by a residential community. Annually up to 35,000 FCLP operations are proposed, mostly at night. The civilian residents of the area are subjected to frequent noise, vibration, and anxiety about crashes because of these operations. Whidbey Islanders for a Sound Environment (WISE), a large community organization, has often complained about this situation. The Navy has continued operations under “waivers” at this site due to runway inadequacies and has persisted in operation despite repeated warning from residents and government officials.

(b) Shelter Bay is a community located at LA Conner, 6.9 miles east of Ault Field directly off the approach/departure corridor for runway 25/07. It experiences frequent overflights of low level jet traffic and is subject to considerable noise impact and risk of civilian casualty.

(c) March Point is a small peninsula on Fidalgo Island 11 miles northeast of Ault Field. The peninsula is the site of two major oil refineries as well as several smaller chemical industries. Several of the routine approaches to NAS Whidbey bring aircraft on a ground track over March Point. These include HI TACAN 7 & 13, GCA 7 & 13, as well as many vectored and visual approaches. The refineries contain billions of pounds of explosive and toxic substances. Among these are substances which have a potential for support of fires (4.4 billion pounds), explosive pressure release (160 million pounds), chemical reactivity (400,000 pounds), acute health effects (4.7 billion pounds), and chronic health effects (4.4 billion pounds).

In communicating with both refineries, it is apparent that their disaster plans are poorly conceived and don't include the possibility of a Naval aircraft losing control and crashing into multiple containment facilities for these toxic substances. In fact, during February of 1991, a small-scale disaster occurred at Texaco wherein a pump casing exploded and a large quantity of unrefined oil escaped onto land at the refinery. Some of this oil subsequently entered Fidalgo Bay. Texaco's response was characterized by slowness and chaos. Texaco seemed unsure how to proceed with water cleanup and animal rescue procedures. Community concerns were raised about the effectiveness of company responding to a large-scale disaster. Ultimately a lawsuit and fines were imposed.

(d) Guemes Island is located 13.9 miles north of NAS Whidbey and one mile north of Anacortes. Prior to 1988, this small island community was rarely overflown by A-6 traffic. In 1988 NAS Whidbey arbitrarily decided, without following the NEPA process, to place a radar turning point at Cap Sante and vector aircraft away from Anacortes and over Guemes. Since that time, Guemes was subjected to exponential increases in noise energy and accident potential. The Guemes Island Environmental Trust (GIET) was formed and filed suit against the Navy, claiming a violation of their rights under The National Environmental Policy Act. In early 1991, the commanding officer of NAS Whidbey announced to the GIET that the radar turning point would be removed from Cap Sante. Subsequently, A-6 traffic has flown over Anacortes, avoiding Guemes. As the noise and safety issues increase over Anacortes, similar thoughts of lawsuit are entertained by residents of Anacortes for yet another violation of the NEPA process.

(e) Oak Harbor is a small city located two miles south of Ault Field. It is located directly off the approach/departure corridor of runways 31/13. Because of its proximity to NAS Whidbey, Oak Harbor's business and residential communities are particularly at risk of damage from an accident. NAS Whidbey has the smallest land base associated with jet operations of all Naval facilities (<5,000 acres.) No new Navy land of significance has been purchased since the 1940's. The Navy's aviation operations have encroached significantly on the surround communities since 1985. Island County is one of the fastest growing populations in the state and is composed of many retirement and recreation oriented people.

Local citizen groups including FISE and WISE have repeatedly offered solutions to mitigate many of the factors contributing to safety dangers. The cost of them might be high in absolute terms but reasonable in relative terms compared to potential property damage and liability claims in legal actions arising out of a disaster at Coupeville, Oak Harbor, or the oil refineries on March Point.

These alternate solutions include:

(a) Building an alternate landing field at a remote site such as Quillayute on the Olympic peninsula some 84 miles from NAS Whidbey would allow FCLP and other operations to occur away from populated areas and continue all night if desired. Cost estimates of \$25 million have been alleged for restoring the existing field to Navy standards. Additional costs would include the added time of flight of approximately \$840/round trip (25.2 minutes @ 400 KTS \$2,000/hr.)

(b) The cost of relocating operations to Lemoore, CA or Oceana, VA may be significantly less when all factors are considered. These sites have existing facilities and surrounding property that buffers them from noise and safety considerations.

In summary, significant Navy aircraft accident potential exists within 15 miles of NAS Whidbey. There have been numerous accidents at and around the base in prior years. Due to the small size of Navy land holdings and the growing civilian residential, business, and industrial communities surrounding NAS Whidbey, a Naval aircraft crash may eventually cause a community disaster. The EIS should address the issue of aircraft flight operation encroachment on the surrounding communities. The Navy should abandon its philosophy of designating accident zones in community property and replace it with one of eliminating the accident risk by purchasing the areas at risk or removing flight operations to areas where they own the land at risk. Flight operation over particularly sensitive area should be eliminated. One of these is the March Point refinery complex on Fidalgo Island. The EIS should include an alternative that removes flights from the populated areas in the EIS study area to a remote area where encroachment by the Navy on the community is reduced or removed. The cost analysis of implementing such an alternative, though discussed briefly in this EIS, does not realistically address the issue when factoring in legal, medical, and reconstruction costs that would result from an aircraft accident disaster.

8. Tucker Act

(a) https://www.law.cornell.edu/wex/tucker_act

“Under the Tucker Act of 1887, the United States waived its sovereign immunity as to certain kinds of claims. Although the government is immune to lawsuits as a general rule, the Tucker Act exposes the government to liability for certain claims. Specifically, the Act extended the original Court of Claims’ jurisdiction to include claims for liquidated or unliquidated damages arising from the Constitution (including takings claims under the Fifth Amendment), a federal statute or regulation, and claims in cases not arising in tort. The relevant text of the Act is codified in 28 U.S.C. §§ 1346(a) and 1491.

Specifically, the Tucker Act permits three kinds of claims against the government: (1) contractual claims, (2) noncontractual claims where the plaintiff seeks the return of money paid to the government and (3) noncontractual claims where the plaintiff asserts that he is entitled to payment by the government.

Today, jurisdiction over Tucker Act claims is vested in the United States Court of Federal Claims. The United States Court of Federal Claims has exclusive jurisdiction over Tucker Act claims in excess of \$10,000, while another statutory grant of jurisdiction—the so-called “Little Tucker Act”—allows the court to entertain similar suits against the United States for claims of less than \$10,000 concurrently with the federal district courts. Prior to the passage of the Federal Courts Improvement Act of 1982, however, this jurisdiction was vested in the original U.S. Court of Claims.”

(b) Some attorneys interpret this law to mean that property “taken” (i.e., when value is decreased due to the action taken by the government) or people are damaged (physical or medical harm) by federal actions such as aircraft overflights, that those harmed are due “just” compensation for the damages.

9. Conclusion

Current Naval aircraft operations at Ault Field and OLF Coupeville impose significant harm and risk to health and safety for the surrounding civilian communities. The proposed actions addressed in this EIS, i.e., increasing the number of Growler aircrafts and flight operations, significantly increases that risk from dangerous to an intolerable level. There is likely to be vigorous community response to implementation of any of the three alternatives. Citizens may choose to litigate singly or as a class against increasing health issues, compensation for accident damage, or a “taking of their property” (Tucker Act).

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44. Swift, H: A Review of the Literature Related to Potential Health Effects of Aircraft Noise. PARTNER Project 19 Final Report, July 2010: see two matrix tables on the following pages for a comprehensive summary of the literature:

Matrix 1: Studies Linking an Environmental Noise Stressor or Sleep Disorder to a Consequent Intermediate or Long-Term Health Outcome

	Night-time noise	Day-time noise/general noise	Sleep Disordered Breathing
Hypertension/Blood Pressure Alterations	Babisch 2006 Bach 1991 Carter 2002 Griefahn 2008 Haralabidis 2008 Jarup 2008	Andren 1980 Aydin 2007 Babisch 2006 Bjork 2006 Chang 2003 Chang 2007 Eggerteson 1984 (acute) Fogari 2001 Fouriaud 1984 Goto 2002(no significant finding) Kluizenaar 2007 Lusk 2004 Rosenlund 2001 Regecova 1995 Talbot 1999 van Kempen 2002 Zhao 1991	Bixler 2000 Morrell 2000 Newman 2001 Pankow 1997
Heart Attack (Myocardial Infarction)	Babisch 2006	Babisch 2000 Babisch 2004 (NaRoMI) Babisch 2006 Davies 2005 Grazuleviciene 2004 Hoffman 2006 Ising 1997 Selander 2009 Tonne 2007 Van Kempen 2002	D'Alessandro 1990 Hla 2001 (Ischemia) Newman 2001 Shahar 2001 Winkelman 2007
Nondipping			Portaluppi 1997 Loredo 2001
Miscellaneous Mortality/Health		Franssen 2004 Melamed 1997 Fujino 2007 Evans 1998 Andren 1981 Persson Waye 2001	

Matrix 2: Studies Showing Noise Leading to Acute Effects

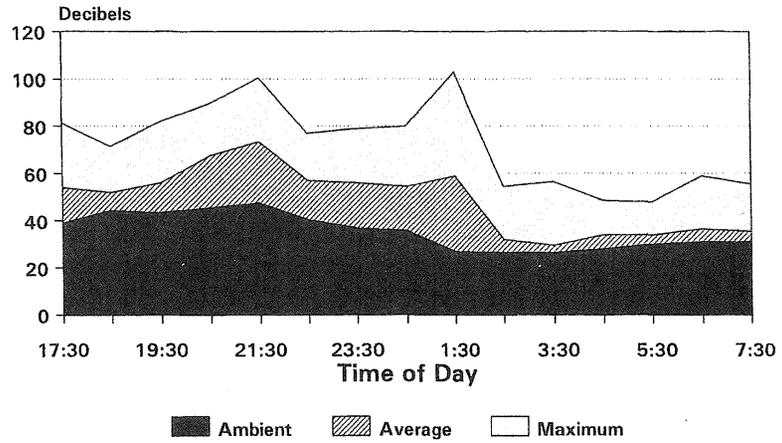
	Aircraft	Other Traffic/Work	Synthetic Noises
Stage Arousals	Basner 2008 (against) Basner 2008b Flindell 2000 Griefahn 2006	Bach 1991 Eberhardt 1987 Griefahn 2006 Marks 2008	Campbell 2005
Autonomic Arousals and Transient Blood Pressure	Carter 2002 Carter 1994 Haralabidis 2008	Bach 1991 Carter 1994 Carter 2002 Di Nisi 1990 Griefahn 2008 Kuroiwa 2002	Aaron 1996 Di Nisi 1990 Johnson 1968 Townsend 1973
Awake Arousal and Transient Blood Pressure		Andren 1980 Chang 2003 Chang 2007 Di Nisi 1990 Eggertson 1984 Fogari and Zoppi 2001 Hansson 1984 Lusk 2004 Raggam 2006	
Generic Sleep Disturbance	Basner 2006 Basner 2008 Fidell 1995 Flindell 2000 Griefahn 2006 Horne 1994 Michaud 2007	Griefahn 2006 Eberhardt 1987 Marks 2008 Ohrstrom 1995	Bonnet 1986 (background) Aaron 1996
Habituation	Kuroiwa 2002		Townsend 1973 Rabat 2005

Table 1

FISE Noise Study
 Measurement Site Locations
 Ldn All Measurements

Community	Ldn: All Dates	Address of Site	DEIS Equivalent Site
Coupeville	79.9	South Admiral Drive	6
Dugualla Bay	62.5	East Dugualla Road	11
Oak Harbor	63.4	Polnell Road	NA
North Whidbey	63.5	Park Lane off Troxel	NA
Deception Pass	70.3	State Park	NA
Dewey Beach	58.7	Yokeko Drive	NA
Rosario Bluff	59.6	Taylor Road	1
Fidalgo Ginnett Rd	54.0	Ginnett Road	NA
Campbell Lake	52.7	Campbell Lake Road	NA
Shelter Bay	62.4	Tillamuck & Klamath	10
Skyline	56.3	Skyline Way	2
Guemes	53.6	South Shore Road	9
Lopez	58.2	Whatmough Bay	NA
Orcas	49.2	Moss Hill Road	NA

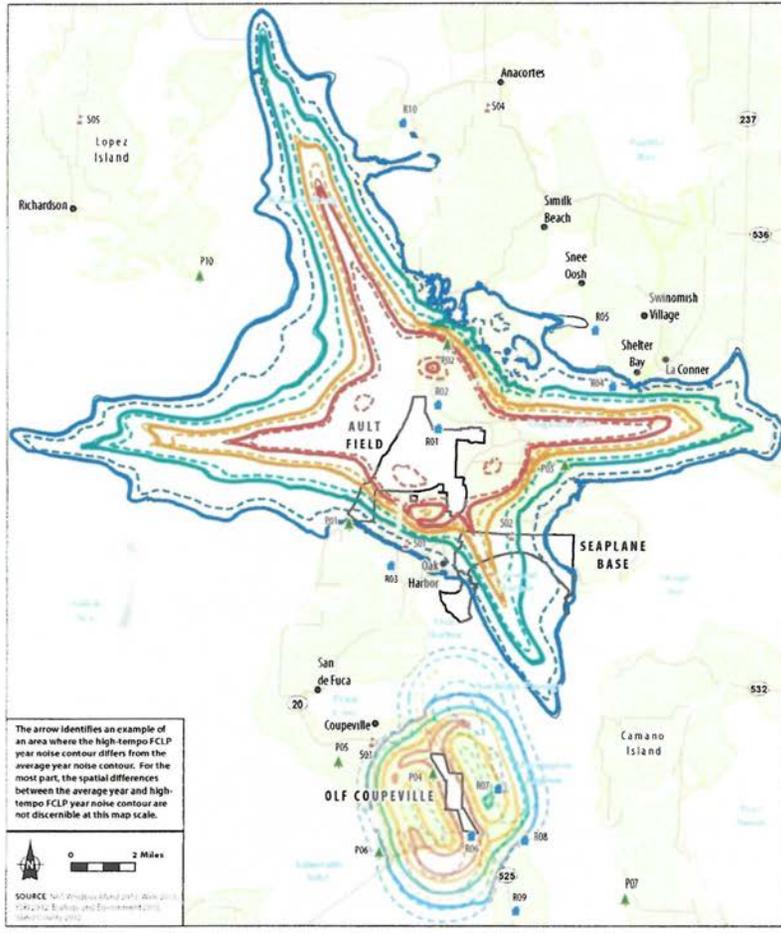
Sleep Disturbance by Navy Jet Noise Campbell Lake Road 7/18/89



Leq = 61.5, Ldn = 63.8

Figure 1

Figure 2



The arrow identifies an example of an area where the high-tempo FCLP year noise contour differs from the average year noise contour. For the most part, the spatial differences between the average year and high-tempo FCLP year noise contour are not discernible at this map scale.

SOURCE: "Self-Inspection Report" (2011), 2011, 2012, 2013, 2014, 2015, 2016, and 2017. Prepared by: [unreadable] and [unreadable] (2018), [unreadable] 2019.

- City
- County Boundary
- Major Road
- Installation Area
- ▲ Park
- Residential
- School
- No Action (Average) DNL Noise Contour (dB)
 - - - 40
 - - - 65
 - - - 70
 - - - 75
- Alternative 2C (Average) DNL Noise Contour (dB)
 - 50
 - 55
 - 60
 - 65
 - 70
 - 75
- Alternative 2C (High Tempo FCLP) DNL Noise Contour (dB)
 - 50
 - 65
 - 70
 - 75

Figure 4.2-11
Alternative 2C DNL Noise
Contours for Ault Field
Whidbey Island, Island County, WA

Table 2

FISE Community Noise Study 1989-1990: Maximum Noise During Navy Jet Flying 5,578 hours (261 days) utilizing Quest M27 & M28 Sound Level Meters										
Community	Flying									
	M70	M75	M80	M85	M90	M95	M100	M105	M110	Lmax
Coupeville	3 ± 4	3 ± 4	7 ± 7	6 ± 3	12 ± 9	14 ± 7	14 ± 8	14 ± 7	5 ± 7	111 ± 4
Duguella Bay	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oak Harbor	29 ± 8	24 ± 12	27 ± 15	17 ± 13	4 ± 2	1 ± 0	0	0	0	96 ± 5
North Whidbey	68 ± 52	34 ± 20	8 ± 3	1 ± 0	1 ± 1	1 ± 1	0	0	0	94 ± 8
Deception Pass	86 ± 47	49 ± 14	38 ± 23	12 ± 3	11 ± 9	10 ± 14	5 ± 6	2 ± 2	0	105 ± 6
Dewey Beach	57 ± 29	22 ± 4	9 ± 4	1 ± 1	1 ± 2	0	0	0	0	88 ± 3
Rosario Bluff	80 ± 55	57 ± 44	16 ± 11	3 ± 2	1 ± 1	0	0	0	0	92 ± 3
Fidalgo Ginnett Rd	26 ± 6	16 ± 1	11 ± 1	2 ± 0	1 ± 1	0	0	0	0	89 ± 4
Shelter Bay	63 ± 50	38 ± 23	23 ± 20	6 ± 4	3 ± 3	2 ± 4	1 ± 1	0	0	99 ± 9
Skyline	70 ± 19	16 ± 11	4 ± 2	1 ± 1	0	0	0	0	0	85 ± 3
Guemes	21 ± 9	11 ± 2	6 ± 3	2 ± 1	1 ± 1	0	0	0	0	89 ± 3
Lopez	16 ± 8	6 ± 2	1 ± 1	1 ± 0	0	0	0	0	0	88 ± 4

All measurements are mean ± standard deviation
 NA = Not Available
 M70 = Number minutes when maximum sound was in the 70-74 dBA range
 M75 = Number minutes when maximum sound was in the 75-79 dBA range
 M80 = Number minutes when maximum sound was in the 80-84 dBA range
 M110 = Number minutes when maximum sound exceeded 110 dBA
 Lmax = Maximum dBA recorded during entire day

Table 3

FISE Community Noise Study 1989-1990: Average Noise During Navy Jets Flying 5,578 hours (261 days) utilizing Quest M27 & M28 Sound Level Meters														
Community	Not Flying		Flying											
	Leq	Ldn	Leq	Ldn	A65	A70	A75	A80	A85	A90	T65	N65	L90	AN
Coupeville	45.2	50.8	76.1	80.3	14 ± 8	28 ± 15	35 ± 13	26 ± 24	20 ± 27	12 ± 24	136 ± 65	53 ± 35	38 ± 0.5	38 ± 7
Duquella Bay	45.3	49.5	59.9	64.3	22 ± 7	20 ± 11	7 ± 5	2 ± 2	0	0	50 ± 21	11 ± 10	39 ± 0	25 ± 2
Oak Harbor	48.3	49.1	62.4	64.9	NA	NA	38 ± 1	26 ± 3						
North Whidbey	45.7	47.9	60.6	63.5	NA	NA	37 ± 1	26 ± 3						
Deception Pass	45.6	48.0	70.7	72.0	NA	NA	40 ± 1	31 ± 4						
Dawey Beach	52.4	54.4	58.5	60.1	40 ± 30	20 ± 18	1 ± 1	0	0	0	61 ± 46	9 ± 18	39 ± 1.3	21 ± 3
Rosario Bluff	42.2	46.6	59.9	60.5	NA	NA	40 ± 1	21 ± 1						
Fidalgó Ginnett Rd	48.9	50.7	51.2	54.8	8 ± 4	2 ± 1	1 ± 1	0	0	0	10 ± 5	1 ± 0	38 ± 0.5	16 ± 2
Campbell Leko	48.5	52.6	50.3	53.1	4 ± 2	2 ± 1	0	0	0	0	6 ± 3	0	39 ± 1.0	13 ± 2
Shelter Bay	44.7	53.6	56.9	63.5	20 ± 19	7 ± 6	2 ± 3	1 ± 1	1 ± 1	0	30 ± 26	5 ± 11	39 ± 1.6	19 ± 4
Skyline	50.3	55.7	52.4	57.2	7 ± 1	4 ± 3	1 ± 1	0	0	0	12 ± 5	1 ± 1	39 ± 0	16 ± 2
Guemes	44.7	51.0	52.0	56.1	10 ± 9	2 ± 2	1 ± 1	0	0	0	13 ± 11	1 ± 3	39 ± 0.4	15 ± 3
Lopez	48.6	53.5	60.1	64.1	7 ± 5	2 ± 1	1 ± 1	0	0	0	11 ± 6	1 ± 1	39 ± 0.5	19 ± 4
Orcas	46.2	49.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

All measurements are mean ± standard deviation except Leq & Ldn which are calculated from all measurements during the specified period

NA = Not Available

Leq = Equivalent sound level, i.e., all sound energy averaged over the time period

Ldn = Equivalent sound level day-night (10 dBA penalty for sound between 2200-0700)

A65 = Number of 1 minute Leq's that were in the 65-69 dBA range

A70 = Number of 1 minute Leq's that were in the 70-74 dBA range

A75, etc as above

A90 = Number of 1 minute Leq's that exceeded 90dBA

T65 = Sum of all A65-A90 minutes, i.e., all one minute events exceeding 65 dBA (almost all of these represent military jet activity)

N65 = Same as T65 except only those events between 2200-0700 hours

L90 = Leq exceeded during 90% of all recordings (Represents ambient sound, i.e., the average quiet background noise)

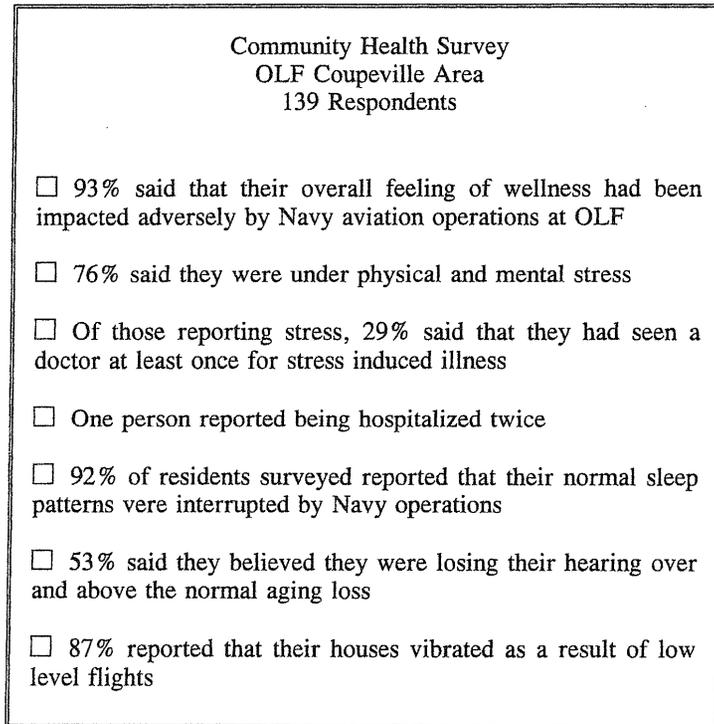
AN = Ldn-L90, a measure of human annoyance with noise pollution. Where community response is: AN 7 = no response; AN 11 = sporadic complaint; AN 17 = widespread complaint; AN 26 = threats of litigation; AN 33+ = vigorous action

Table 4

FISE Community Noise Study, 1989-1990: Relative Loudness 5,578 hours (261 days) utilizing Quest M27 & M28 Sound Level Meters			
Community	Not Flying	Flying	Relative Loudness*
	Leq	Leq	
Coupeville	45.2	76.1	8.1
Duguelle Bay	45.3	59.9	2.8
Oak Harbor	48.3	62.4	2.7
North Whidbey	45.7	60.6	2.8
Deception Pass	45.6	70.7	5.7
Dewey Beach	52.4	58.5	1.5
Rosario Bluff	42.2	59.9	3.4
Fidalgo Ginnett Rd	48.9	51.2	1.2
Campbell Lake	48.5	50.3	1.1
Shelter Bay	44.7	56.9	2.3
Skyline	50.3	52.4	1.2
Guemes	44.7	52.9	1.8
Lopez	48.8	60.1	2.3
Orcas	46.2	NA	NA

Leq = Equivalent sound level, i.e., all sound energy averaged over the # of hours
 * Perceived loudness changes 2 fold for each 10 dBA increase in noise

Figure 3



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

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:

Greenbank, WA 98253

The Navy has proposed three options for flights of additional Growlers on Whidbey. A 50/50 split or 80/20 or 20/80 split between the OLF and Ault Field. Perhaps the Navy is not aware that these communities are struggling to cope with the recent election. Neighbors are afraid of neighbors/liberals afraid of conservatives/right afraid of left. The civil discourse is disintegrating. There is rampant anxiety due to the election. People are suffering from fear. And the suggestion that this is the right time to incur even more anxiety on these communities by pitting them against each other in a contest to see who gets more terrifying, anxiety creating noise is lacking in compassion of any kind. I attended a meeting of like-minded people yesterday who said that neighborhoods need reconciliation now or they will split into factions. People seriously fear their neighbors. Things may settle back into recognizable patterns, but they may not also. There is a sociological crisis on Whidbey Island right; several bus loads of women are traveling to Seattle to participate in a Women's March on January 21. These women are upset with the election and any suggestion that a Republican influenced military will bring more environmental damage, more discord, more homelessness, fewer affordable living units and more anger to the island is upsetting. The Navy is pitting two communities at a time that is unconscionable to do so.

1.a. Thank You

1.d. General Project Concerns

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

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 _____, Lopez, WA 98261

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.l. No Action Alternative
- 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.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see 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:

We need actual measurements of noise
Especially low frequency noise on Lopez.
Rather than estimates from models.

(Continue on the back)

we are getting hammered by noise and vibrations

Why is the no action alternative not being considered?

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 _____

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- 12.h. Tourism
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January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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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 have been dismayed that despite a great deal of input, the Navy continues to average the noise level over the year, does not measure the low frequency rumbles we experience, and uses an outdated computer model NOISEMAP. I trust these will be corrected to get an accurate measure of the intense noise and rumble we are experiencing.

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: Wednesday, December 7, 2016

PLACE: Lopez Center for Community and the Arts
204 Village Road
Lopez Island, Washington

TIME: 3:00 p.m. to 6:00 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
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 2.a. Purpose and Need
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

13

* * *

14

(The personal identifiable information disclosure

15

statement was read to the following commenter.)

16

MS. [REDACTED]: Okay. I'm [REDACTED]. I

17

live at [REDACTED], Lopez Island, Washington, directly

18

across the water from the Whidbey plant. The stenographer

19

here has read this really important line to me about the

20

confidentiality of it.

21

And I'd like to say that I'm so tired of this

22

noise. I have a head injury. I work outside. I have to

23

lay on the ground and cover my head sometimes because it is

24

so noisy. I feel like my head is going to blow up. I have

25

animals. They all freak out all the time when this happens.

1 I left last year for a month. The first thing
2 that happened when I woke up in the morning and I was still
3 in my, you know, subconscious or, you know,
4 semiconsciousness was I woke up and this is what I said: I
5 don't feel like it's the end of the world here. That's what
6 I said. I didn't even realize that that's how I feel, but
7 with these jets going over all the time it is how I feel.

8 I just want to say I'm totally against any more
9 jets coming here. I just don't understand the purpose. My
10 understanding is that the jets don't even need to be that
11 noisy. It's just so the people in the jets are like
12 15-year-old boys who need to get Glasspacks and loud stuff
13 on their cars so they can scare people. Such an old, lousy
14 trick.

15 Yeah, I -- it's -- it's -- it's beyond me, I
16 guess, because I don't even understand this war culture. So
17 I would just like to say I'm really disappointed in America,
18 and it's perfect that the eagle is our bird because they're
19 bullies just like us. They are the big bullies. I mean, I
20 watch the birds. I watch the animals that aren't even my
21 animals. They're affected by the noise.

22 And I just talked to the biologist. He said we
23 have plenty of eagles nests where we are and they don't seem
24 to leave. No, but they're out of their minds probably. I
25 don't leave either because I can't leave and I happen to

1 like my home, or did, but, you know, if I -- I'd seriously
2 consider leaving and this is why, and, you know, the eagles
3 probably do too, only they have their community and their
4 nests like that. That's why they don't leave. It's not
5 because of the jets.

6 I mean, look at the native people. They're
7 willing to stand there right in the face of utter, utter
8 unfair creepiness, but they're standing there because they
9 have courage. So anyway, thank you.

10 * * *

11 (Further statement by Ms. [REDACTED].)

12 MS. [REDACTED]: Okay. The other thing I
13 wanted to say is that I feel like it just creates a tension,
14 a tension between people because it's irritating. It gets
15 on your nerves. It just raises your anxiety level a little
16 bit, and -- or progressively more probably, but I just want
17 to say that it -- you know, the only reason for these planes
18 is you could call it protection if you want, but it's about
19 war and killing and scaring and ugliness, and those flying
20 over cannot possibly leave that -- not leave that imprint on
21 people. Children too.

22 And I hear the kids. I mean, the kids are
23 scared. I mean, I saw two kids the other day who had never
24 been to the south end beach. They came. They were
25 screaming their heads off when the Growlers came. They'd

1 never came to the south end beach, and they were screaming
2 their heads off. I mean, I just feel like it affects people
3 a lot on levels that are really difficult to measure.

4 Thank you.

5 (The Public Meeting concluded at 6:00 p.m.)
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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;** 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** Resident
3. **Address** _____ Coupeville WA
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

Two Concerns

1. The projected noise-distraction impact on K-12 students is not acceptable in terms of learning outcomes. 2 distraction events per hour is completely disruptive to young learners and 1 is sufficient to lose concentration for minors.

2. The Noise impact study is biased in favor of Oak Harbor. Coupeville has very few "points of interest" acc. to the study, making this historic town a target for more flights per day over houses @ the prairie. This bias needs to be corrected.

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.l. Points of Interest
4.o. Classroom Learning Interference

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.

2. Request - It's valuable for citizens to have access to representatives of the Navy. This connection has been made today. Thank you.

For more information, please visit the project website at 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

Coupeville, WA 90004

Environmental Impact Statement Comment Form EA-18G Growler Airfield Operations at NAS Whidbey Island Complex Submitted on 2/23/17 to:

<http://www.whidbeyeis.com/Comment.aspx> 1. Name: [REDACTED]

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military): 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. If the burden of these increased operations must fall on Whidbey Island, then it should fall primarily on the residents of Oak Harbor, who predominantly favor these increased operations and will enjoy most or all of their local economic benefits. Coupeville is already being punished by our local government for our perceived failure to be "pro-Navy." The Navy should not compound this punishment by placing the burden of supporting the environmental effects of these increased operations on those citizens who have the least political power to address the consequences of the increase. Comments (Summary) 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. Details: 1. The town of Coupeville and the surrounding Ebey's Reserve are a recognized local, State and national treasure, described by the National Park Service as "... almost a Paradise of Nature," a "stunning landscape at the gateway to Puget Sound ... [that] preserves the historical, agricultural and cultural traditions of both native and Euro-American – while offering spectacular opportunities for recreation." The unique nature of the land surrounding OLF Coupeville, and the substantial investment of public and private resources that has gone into the creation of this Reserve, are not adequately addressed in the DEIS. Also not addressed is the compatibility of increased Navy operations with the purposes of the Reserve. If the purpose of the DEIS is to determine where to locate these increased operations as between the Coupeville OLF and the vastly larger Navy facilities in Oak Harbor, then it is important to note that Oak Harbor has no comparable investment in preserving "historical" Whidbey Island traditions. 2. The DEIS must address the importance of tourism to the Coupeville area. Here, we're not talking about an impact that can be assessed by scientists and engineers. If we develop a reputation for being a place where you cannot predictably hold a picnic or go for a hike without being impacted by

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.a. Socioeconomic Study Area
- 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
- 3.a. Aircraft Operations
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports
- 8.e. Outlying Landing Field Coupeville and Coupeville History
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve
- 8.h. Ebey's Landing National Historical Reserve, Military Association

noise, then tourists are going to go elsewhere, regardless of whatever charts and graphs the Navy might produce. 3. Residents of Whidbey Island are well aware that the economic benefits of Navy operations on the Island are concentrated in the Oak Harbor area, as is the political support for expanded Navy operations. It is no wonder that Oak Harbor residents support these operations: they will reap the benefits, while those of us in Coupeville will bear the costs. We have already seen this on Whidbey Island, as Oak Harbor's real estate market is booming, while Coupeville's is stagnant. Again, if the purpose of the DEIS is to determine where these increased operations should take place, then it makes sense to locate them in Oak Harbor, not in Coupeville. 4. Living in Coupeville, it becomes obvious that Navy personnel largely do not come here to shop, dine or otherwise spend money. This is not their home, and sadly, we are not their neighbors. This is reflected in the way Navy fliers frequently ignore instructions to minimize the noise impact of their operations at Coupeville OLF. Siting these operations in the community where they live and shop, Oak Harbor, is most likely to cause pilots to conduct their operations in a way that's most respectful to their neighbors—that is, the neighbors they best know. 5. We have become aware of the dangerous potential impact of Navy operations on our groundwater. As of this writing, the Navy has not identified a plan to conduct Coupeville OLF operations in a way that is compatible with the safety of our drinking water. Once again, Oak Harbor is in a better position to absorb the impact of hazardous waste spills at their Navy facility, as they have access to drinking water from the mainland. 6. I attended the Navy's terrific presentation at Coupeville High School a month or two ago, and the representatives at that presentation freely admitted that the noise modeling used in the DEIS is inadequate. The idea of using some kind of adjusted average noise level to determine the impact of touch-and-go operations is, quite simply, misplaced. We are not impacted by average noise levels, but by repeated peak noise levels. Consider it this way: if for one minute a day you are hit over the head with a club, your condition is NOT best described as "on average, not hit over the head with a club." Other residents have submitted DEIS comments on noise levels that describe this more scientifically, but I think my analogy will serve. 7. The DEIS fails to address noise impacts in key locations in the community. 8. Any good DEIS should discuss ways in which environmental impacts can be mitigated, but this one does not. There is no consideration of concentrating flights at times of least impact to the community, or banning flights during school hours, or flying on strict pre-published schedules (rather than the vague notices we receive of flights in the "afternoon"), or modifying or eliminating routes that have the biggest noise impact, or banning flights during tourist-oriented festivals and events in the Coupeville region. 9. While the DEIS refers to the Navy's historic cooperation with elected officials, this has not always been the case, and is not consistently the case even now. The DEIS should set forth strict guidelines for this cooperation, including the formation of a continuing civilian-Navy joint task force, with representation from all members of the community, with oversight over Navy operations impacting our local environment. 10. Our children are our most precious resource. The DEIS describes increased interruptions at school, but not how this will impact learning. Learning disability outside of the classroom should also be evaluated. While 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. 11. The DEIS describes the proposed increase in OLF operations as similar to historic levels of operation. That's simply not the experience of long-time residents in the area. 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. In any event, the DEIS calls for 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. Moreover, the DEIS does not consider the historic noise impact of quieter aircraft flying in the past compared to the noisier aircraft flying today.

Coupeville, WA 98239

1.a. Thank You

4.e. Day-Night Average Sound Level Contours and Noise

I wish you would start using OLF so we could understand what the noise level changes. I've owned a house in Coupeville for 19 years and agreed to the planes when I purchased because it wasn't that bad. I've been told the Growlers should not practice over populated areas...they are too loud..

Coupeville, WA 98239

1) The touch/goes do influence pilot readiness and hence national readiness, but conducting those 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. 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. 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. 4) OLF operations violate FAA elevation rules and, as backed up by the Supreme Court, represent an illegal taking of airspace over our homes and AC property. (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.) 5) Then there is the impact on our economy and property values as revealed in this just published and hot off the press report:
<http://westcoastactionalliance.org/navys...>

1.a. Thank You
12.b. Invisible Costs
12.c. Socioeconomic Impacts
12.j. Property Values
2.n. Alternatives Considered But Eliminated
3.g. Field Carrier Landing Practice Evolutions and High Tempo
3.i. Runway Operating Hours and Flight Schedules
4.q. Potential Hearing Loss
4.r. Nonauditory Health Effects
4.s. Health Impact Assessment and Long-term Health Study
Requests

1.a. Thank You

Coupeville, WA 98239

Thank you for presenting your information regarding the increase of flights at NAS and OLF. I feel like there's really nothing we can do at this point. The planes are coming and there will be more noise.

1.a. Thank You

Coupeville, WA 98239

Thank you for presenting your information regarding the increase of flights at NAS and OLF. I feel like there's really nothing we can do at this point. The planes are coming and there will be more noise.

Coupeville, WA 98239

- 1.a. Thank You
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated

At this moment I'm in favor of closing OLF and expanding Oak Harbor. I believe my property value and quality of life will decline if you implement your 80% plan for Coupeville. It just makes sense that all of your training should be in 1 place, either Oak Harbor, out to sea or in the desert. Please stop the noise over a beautiful historical land reserve.

seattle, WA 98166

1.a. Thank You

1.d. General Project Concerns

I'm highly concerned about the noise pollution, the CO2 emissions, and the impact on the wildlife, complex ecosystem, and human life on the olympic peninsula, whidbey island and the surrounding area.

1.a. Thank You

Everett, WA 98208

I support the EA-18G Growler operations on Whidbey, as they are a very necessary part of pilot training and military preparedness. It is hypocritical of people to move next to an airport, knowing full well that it is there, and then attempt to shut it down because of "noise". We have lost half of our airports in this country since 1960. We can't keep closing down these valuable resources, particularly since once they are shut down, it is impossible to get that space back. Then where would the Navy go for land-based carrier aircraft training for Whidbey pilots? The expense would be enormous to try and duplicate what already exists.

Port townsend , WA 98368

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

I thought the article about increasing growlers to 30,000 a year was a bad joke at first. This level of noise, damage to our precious environment and "rehearsal for war" is 100% unacceptable. I and thousands of others will be taking a stand on this.

Seattle, WA 98115

I am writing about the upcoming plans for the navy to do training exercises over the Olympic National Park. This is such a bad idea on so many levels, environmentally, and morally. The amount of fuel used by these jets, the number of birds and animals affected by them, the visitors from many states and countries that enjoy the quiet magnificent rainforest, the native tribes that will be impacted, just to name a few. Please do not do this training there.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area

9.a. Consideration of Tribes

Port Angeles, WA 98362

Dear Folks, The Navy scares me; they are out of control. They continue to increase their negative impact on the life's of people, sea life, birds and animals who live here with little regard for the consequences of their actions. They have become a bully who continues to insist on their way even though the majority of citizens disagree with that agenda. Why are we spending billions of dollars continually preparing for war? Are there none of you who see the insanity of this? Then you wiggle around regulations set in place to protect the people and environment. Please stop this madness. It only leads to negatively impacting all life here and terrorizing the humans you make war on. Please spend this money, time and energy building peace in the world. Sincerely, [REDACTED]

1.a. Thank You
1.d. General Project Concerns
2.a. Purpose and Need

Coupeville, WA 98239

Thank you for allowing us an opportunity to comment on increased operations at OLF Coupeville. We understand that we must shoulder some of the burden to train our troops properly, and we will happily do so, as long as the result does not cause irreparable harm to our town economy. We are built around agriculture and tourism, and increased flights do not pair well with that equation. We would like to continue to support the 6,200 operations that already fly here. We want to keep our business here, and support the area for what it has to offer. As owners of a small restaurant in Coupeville, we work closely with four farms within five miles of our restaurant. Because the size and location of the Accident Potential Zones is not thoroughly addressed, it has given us cause for concern for the unknown when it comes to growing our business. We have been building our entire business around our local farmers. If this land is rezoned, and we are no longer able to work with them, it will make it hard to continue our current business model. Our customers come because of that relationship, and it would be hard to continue without it. We are grateful to those who serve and protect our freedom to make a living here - we want to still have that opportunity and we can do that by supporting them the way we've always have. Thank you for your time.

1.a. Thank You
12.c. Socioeconomic Impacts
12.f. Economic Hardship and Impacts
7.b. Land Use Compatibility and Air Installations Compatible Use
Zones

Coupeville, WA 98239

The DEIS not not adequately address the economic impact on the Central Whidbey community. What are the hidden costs? This needs to be addressed thoroughly in the final EIS. Loss of tourism, property value loss, decline of population, and loss of business revenue all need to be evaluated more carefully. Specifically, Section 4.10.2.1 describes the likely loss of property value due to increased noise, but does not include any estimates of what the total impact will be. The EIS should quantify the loss of property value. In addition, 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 businesses, such as organic farming, custom home building, and renewable energy. The EIS needs to evaluate all of the economic losses associated with this potential increase in operations.

- 1.a. Thank You
- 12.b. Invisible Costs
- 12.c. Socioeconomic Impacts
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values

Copeville, WA 98239

1.a. Thank You
5.a. Accident Potential Zones

I am deeply concerned about the lack of analysis of APZs and the effects of Accident Potential Zones (APZ) at OLF. 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 APZs were unwarranted at the time. However, annual operations have exceeded 5000 since 2009. There is currently a waiver for APZs which is in violation of the 5000 maximum with 6100 operations annually. Any scenario (even no action) will require the Navy to establish APZs at OLF Coupeville. The final EIS should describe in detail the consequences of establishing APZs 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 APZs; 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 APZs 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.

Coupeville, WA 98239

The risk of water contamination to the sole-source aquifer in central Whidbey Island surrounding OLF Coupeville is not adequately addressed in the DEIS. Perfluorinated chemical compounds used as flame-retardant foam have contaminated private and public drinking water wells near OLF. The EPA's Health Advisory Levels for two of these chemicals, PFOA (perfluorooctanoic acid) and PFOS (perfluorooctane sulfonate) is 70 parts per trillion (PPT). PFOA has been linked to kidney and testicular cancers, birth defects, damage to the immune system, heart and thyroid disease, and pregnancy complications. EPA's Science Advisory Board lists it as a likely human carcinogen. Coupeville's four public wells near OLF have been tested by the State Department of Health. One well at Keystone showed PFOA results of 59 and 62 PPT in two separate samples. No PFOA's were found in the town's three other wells. The Navy is conducting an investigation into the contaminated aquifer and private wells on properties within a mile radius of OLF. The Navy is offering to test wells for three chemicals, PFOA, PFOS and PFBS. To date, 8 private wells have tested well over the 70 PPT limits up to a range of over 600 PPT. So far, 10% of wells tested are above EPA limits. An increasing number of residents are being told by the Navy not to drink or cook with their water. The DEIS does NOT address or assess the risk of additional future contamination with expanded flight operations. The following should be evaluated:

- Risk and effects of a Growler crash and of the aqueous film forming foam (AFFF) 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.
- The lack of an alternative water source for the Town of Coupeville and the surrounding Central Whidbey community.
- Viability, cost, and impact of remediation of groundwater pollutants and of providing an alternative drinking water source. The full short and long-term impacts, including environmental, economic, cultural, & financial need to be analyzed.

1.a. Thank You

11.a. Groundwater

11.d. Per- and Polyfluoroalkyl Substances

12.c. Socioeconomic Impacts

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: 1. Seismic events, including consequences of shaking, tsunami, 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. 2. 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. 3. 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. 4. 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. 5. 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)
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 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

Coupeville, WA 98239

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

I urge you to include a 60 day comment period after the final EIS is issued. This is important to me, my community, and people all across Puuget Sound whose lives are impacted by the Growlers. I live directly below the flight pattern in Coupeville.

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)
Coupeville Community Allies

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. PTSD, cardiovascular impacts, gastro issues
- 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. Will we become the next Oceana, Virginia?

(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. *what will happen to our farmers? our local food? our historic farms?*

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. *No APZ in DEIS*

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 research is clear - There are impacts on health, mental health, ^{and} learning/academic performance from jet noise. The EIS needs to address this research, not ignore or dismiss it, in the final EIS.

• single siting growlers - 160 - really?? at NASWI does not reflect our military leaders at the Pentagon's best thinking and planning. This is a security risk!

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

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

1.a. Thank You

13.a. Environmental Justice Impacts

I am concerned about the impact of the preferred option of the increase to 35,000 operations annually at OLF on low income families here. Residents who can afford it will move; low income families and seniors will not be able to move. This is not addressed in section 3.11.2 or 4.11 of the EIS. Please do a more complete job of addressing these impacts and considering the potential disproportionate impact on choice based on income level.



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 [REDACTED]

3. Address [REDACTED] Coopersville 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 concerns are as follows -

① Impact on children. The EIS does not thoroughly address the impact on our kids. No mention of ~~EMF~~ CMS/CHS which is closer to the flight pattern - for example figure 3.3.2 on p. 3-47. Executive order 13045 (p. 3-44) states that it is a high priority to identify and assess the environmental health risks and safety risks that may disproportionately affect children. This HAS NOT BEEN DONE!

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.e. Agriculture Analysis
- 12.h. Tourism
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.I. No Action Alternative
- 4.r. Nonauditory Health Effects
- 5.d. Environmental Health Risks and Safety Risks to Children

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.

Impact on tourism/local economy. There is no analysis of the impact on local businesses, farms, and tourist traffic based on the proposed increase in operations.

The EIS is not complete. More analysis is needed. An extension is necessary. I support the No Action Alternative.

For more information, please visit the project website at 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

I am concerned about environmental justice. In Section 3.11, the Navy has concluded that there are no significant impacts or that impacts do not disproportionately impact low income communities and communities of color. People who can afford to sell their homes and move out of the impacted have a choice. Low income people do not have the same choice. This is a disproportionate impact. Second, I am concerned about putting all of the EA-16s at NAWI. This sounds like a dangerous move, a potential replication of Pearl Harbor. This concern was raised by a Coupeville Town Council member and I share this concern. There is no clear rationale in the DEIS for why all the Growlers need to be at NAWI.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 13.a. Environmental Justice Impacts
- 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 very concerned about the current reality that OLF has a waiver for an APZ. Does this mean that that the field is being used without an official APZ? What laws allow this waiver to be permitted? The field does not meet the requirements for Growler operations, it is too short by several hundred feet. How will this be addressed for future operations? The DEIS does not provide any specific information about a proposed new APZ. The likelihood of a large, new APZ that could be created as a result of this EIS that impacts property rights and significantly reduces property values is of enormous concern to me and my neighbors. The final EIS needs to address these concerns directly.



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.

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- 2. Organization/Affiliation
- 3. Address Avacortes
- 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

We are concerned that without additional housing on base, that the increase in commuting traffic on Rt 20 & Rosario will negatively affect ^{south} Whidbey Island residents.

Of course, it also affects the quality of family life for the new squadron members

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.i. Housing Access and Affordability
- 12.n. Quality of Life
- 14.a. Transportation Impacts

Seattle, WA 98125

PLEASE do not increase naval aircraft around Olympic National Park - humans and other animals need this to remain the quiet refuge it is. My family and I have camped at Deception Pass for years, unfortunately, the aircraft noise disturbs the peace of the outdoors and we won't be returning. Please do not take away the little freedom we have left to enjoy the public lands...

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area

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

Bryn Mawr, PA 19010

My husband and I own land on Whidbey not far from the Coupeville High School, that was to be our retirement site. Unfortunately with the noise of the Growlers, we will have to figure something else out. We are trying hard to make sense of all these reports. As best we can tell, the Coupeville High School, and Middle School are not included in the DEIS for noise measurements or impact, even those these schools are closer to the flight pattern than the Coupeville Elementary School. The final EIS MUST address the impact on these two schools. I will add other comments as I get through this material. Thank you.

- 1.a. Thank You
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference

Bryn Mawr, PA 19010

Still reading through these materials and two things strike me: 1) I think you need to allow a 60-day comment period after the final EIS is completed to let all citizens to respond. Also it looks like the DEIS is using an outdated noise simulation model that a Dept of Defense study showed is not appropriate for Growler engines. You all need to use actual sound measurements with the right sound measurement equipment. Finally, please keep in mind that any cost/benefit analysis that the Navy does has to take into account the costs inflicted on the community that leads to any harm for which the Navy, and the government will have to pay actual dollars in the future. Let's do these studies right and come to a conclusion that makes sense for all parties.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.j. Costs of the Proposed Action
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.f. Noise Measurements/Modeling/On-Site Validation

1.a. Thank You

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
18
19
20
21 Court Reporter: Nicole Johnson
22 Olympic Court Reporting Services
Chimacum, Washington 98325
23 (360) 732-4600
24
25

15 ██████████: Here's what I was going to say. I
16 thought I was going to get to stand up in front of these
17 people and give them my two bits. How apropos we are here
18 at Fort Worden, a military installation that was built at
19 the turn of the century. It was commissioned, I think, in
20 1902. I could pull out my information so I could be
21 somewhat -- yeah, 1902. They closed it in 1953.

22 This installation was put here to protect this
23 country. This was before the World War I started, and we
24 saw what was coming. I wonder how many people are
25 complaining about the noise from these guns that were out

1 here. Thank God they never had to use them on the enemy,
2 but they still had to practice and had to be prepared.

3 These guns use 63 pounds of explosive on the big
4 guns. I know that made a lot of noise because my dad
5 moved out here from Ohio, started a company fabricating
6 metals using explosives. That's why we're out here in the
7 woods. I'll go further on that later.

8 But there is a sacrifice for the sound, which
9 brings me to the best sign I've ever seen anywhere.
10 Whidbey Island used to have a sign that they took down,
11 and I pray they put it back so people understand what's at
12 stake here. They had a sign out there that said "Please
13 excuse the sound. This is the sound of freedom."

14 My forefathers sacrificed a lot for me, my
15 children. And people have forgotten that freedom is not
16 free. A lot of sacrifice has taken place. And the sound
17 of jets overhead is very comforting to me. As a matter of
18 fact, I'd rather hear the roar of those jets over my head
19 than the rocket's red glare of enemy missiles over my
20 children's head.

21 I moved to this town to seek out a living. When
22 I first moved here, I was with Chamber of Commerce. I'd
23 listen to people complain about the smell of this town and
24 how they just couldn't wait until that mill was gone
25 because it was scaring the tourists away. I kept telling

1 them, you know the smell of this town? That's a town
2 that's still alive. Because I moved to Port Angeles, and
3 there were five mills there. There's only one there now.
4 Port Angeles isn't the same as it used to be.

5 Now, this agenda that these people have is
6 beyond just the sound that's coming out there. They want
7 to shut down the planes going out and practicing out
8 there. They want to shut down -- they want to keep this
9 paradise here. I don't know where they're from, but
10 whatever. They want to keep this paradise, but they don't
11 understand the price to have it here and to be able to
12 come here and complain about this town.

13 They want to -- they almost shut down 30 years
14 ago on a bunch of falls science. It was a spotted owl
15 thing where they had to stop cutting old growth down.
16 That was false science. It had nothing to do with old
17 growth. It had to do with the barred owl that invaded the
18 peninsula -- or invaded the west coast and was driving the
19 spotted owl out. It had nothing to do with old growth,
20 and they shut down the industry. Almost succeeded,
21 completely shut down.

22 My dad started a company here out in the woods.
23 Hunted, got a lot of deer out there. Did some grouse
24 hunting. The deer and grouse are all over out there. I
25 worked out there for many years. My dad would set off a

1 shot, and there was deer standing there five minutes
2 later. I could tell you a little bit more, but I won't.

3 But, again, it didn't bother the deer. It
4 didn't bother the grouse. I've seen all kinds of animals
5 out there. You know, it was a great place to grow up.

6 So this whole noise issue -- and I don't know
7 what other ploy they're going to use to try to shut down
8 what the Navy is here for. The Navy is here to protect
9 us. These people don't understand history. They don't
10 understand that the enemy is at the gates and that these
11 guys are here to protect us.

12 Back to the sign. I wish they would put that
13 sign back up. They should have it all over the place.
14 All these places. All these military places. Because
15 people don't get what sacrifice we really have to make.
16 Just like the mill. That's a town that's still alive.

17 My kids had to move out to have a job and be
18 able to raise a family. I was lucky enough to be able to
19 move here and raise my family in a small town. I left
20 Seattle.

21 All I can say is that that sign, lest we forget.
22 That's all I can say. That's my last line. Lest we
23 forget. I would much rather deal with noise and know my
24 children are safe than to be speaking Chinese.

25

Eugene, OR 97405

The Navy should be cognizant that these fighter jets are catastrophic to the quality of life of people and animals. Stop these training flights in the San Juan area. Better yet, stop them everywhere.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 12.n. Quality of Life
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Seattle, WA 98109

Hello, I am extremely concerned about the Olympic National Forest being used for Navy war games. There will be devastating effects in both humans and wildlife, effects from loud noise including hearing loss, increased stress hormones, cardiovascular disease, immune system compromise and behavioral/psychosocial impacts. 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". I oppose this action and demand that a proper Environmental Impact Report be completed.

- 1.a. Thank You
- 18.b. Average Carbon Dioxide per Aircraft
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 4.I. Points of Interest

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 Hopewell 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

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:

Please keep our skies quiet!

Thanks,



Coupeville, WA 98239

- 1.a. Thank You
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.r. Nonauditory Health Effects

I oppose the increase in the number of Growlers using the OLF in Coupeville, WA. The extreme noise is damaging to our health, and it rattles our windows. This is too much for our small community of citizens to endure.

1.a. Thank You

San Diego, CA 91915

There are so few places left where our military can train safely. Used to be the Navys Readiness liaison to Congress and training range encroachment was a huge issue, particularly for sensitive electronic operations. There are very few areas left where our airmen can go to practice without placing them in danger. Please protect our Growler complex and other military training ranges.

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 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

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.j. Other Reports

4.r. Nonauditory Health Effects

4.t. Noise Mitigation

7.h. San Juan Islands National Monument

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

Victoria, British Columbia V9C2E6

1.a. Thank You

12.n. Quality of Life

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

I find the noise from the Growler aircraft very disruptive. My dogs are stressed out from the noise and it disrupts my peaceful neighborhood. Please do not increase the flights or else redirect them so they are not impacting your Canadian neighbors.

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 Shaw Island, WA
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

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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:

Please please stop the jets.

Camano Island , WA 98282

Dear Navy- while I agree that nothing is more important then the training of our frontline responders and Warriors I am not on that front line. Yet when two F18 G fly over my house and my whole house shakes that's ridiculous. I would very much appreciate minimal throttle while flying over Camino Island and Whidbey Island. I love the sound of freedom which is what I equate the Navy Jets too but not if it shakes my house it's not needed. Please be respectful of our neighborhoods our lives we do want to support you and appreciate you and the work you're doing to keep us free. Thank you [REDACTED]
Camino Island

1.a. Thank You

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

Oak Harbor, WA 98278

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.

Oak Harbor , WA 98278

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").

Oak Harbor , WA 98278

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.

Oak Harbor , WA 98278

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

Oak Harbor , WA 98278

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.

Oak Harbor, WA 98278

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.

Oak Harbor, WA 98278

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

Oak Harbor, WA 98278

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.

Oak Harbor, WA 98278

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

Oak Harbor, WA 98278

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.

Oak Harbor, WA 98278

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.

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 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

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:

Port Angeles, WA 98362

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) 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

- 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

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, piecemeal 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 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](https://energy.gov/sites/prod/files/G%20--%20CEQ%20--%2040Questions.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 a n incredible sta tement 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 anti cipated 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 Defe nse 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](https://dec.alaska.gov/spar/ppr/hazmat/Chemical--&--Material--Emerging--Risk--Alert--for--AFFF.pdf)) 24. No men tion 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 e xtensive ev aluations for a variety of hazardous materials were included in the October 2015 Northw est Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler D EIS? This is the equivalent of a doctor refu sing 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 contami nation, 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 bee n piecemealed: I t 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. B ut b ecause the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildl ife 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 canno t 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 af terburners, 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 complet ely omitted. 26. Pages of b oil erplate language do not constitute analysis of impacts to wildlife: E xcept for standardized language copied from wildlife agencies about species life histories , along with lists of various county critical areas ordinances an d 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.

1.a. Thank You

Coupeville, WA 98239

Coming from a Navy family I've been around Prowlers and Growlers my whole life. Never have I sat and complained. Neither have effected my health or my surrounding nature in any way.

Port Angeles, WA 98362

I have commented and objected previously to the Navy's refusal to do any apparent meaningful environmental impact studies on jet noise or the microwave warfare practice over my home, the Olympic Peninsula and all other life here. The Navy is supposed to protect and defend the citizens of the US, Not Destroy us and our environment...Please Reconsider!

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted

Port Angeles, WA 98362

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, piecemeal 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, and the Navy is legally accountable to the citizens of the areas they will be impacting. 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. How many more areas will be impacted? 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 impact to people and wildlife in the area where I live, the Olympic Peninsula. It certainly appears that the Navy is trying to get away with what may be permanent harms to my environment...More Study and Investigation is needed. Also study of alternative sites for this war gaming...At this point I am more afraid of my nation's military than any imaginary enemies.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 11.d. Per- and Polyfluoroalkyl Substances
- 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.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

Port Angeles, WA 98362

I am dismayed that the Navy is continuing with its proposal to pursue microwave warfare and increase jet noise over the very sensitive Olympic Peninsula, my home. Increased jet fuel consumption alone would exacerbate climate change, and both humans and animals would suffer from the increased noise pollution, not to mention the particles of unburned fuel released overhead.

1.a. Thank You

18.a. Climate Change and Greenhouse Gases

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

19.d. Electronic Warfare

4.m. Supplemental Metrics

6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

Seattle, WA 98136

1.a. Thank You

2.n. Alternatives Considered But Eliminated

The families and children of Coupeville depend the maintenance of the beautiful land for their well-beings. I have heard that the possibility of flying over a less populated location in eastern Washington has been written off because of an added 15 minutes to the pilot's day. The citizens of Coupeville, who are military supporters, should remain a priority over those 15 minutes.

Seattle, WA 98112

I am outraged and deeply concerned by the Navy's desire to hold war games and trainings on the Olympic Peninsula. This is just wrong, on so many levels. First of all, the Olympia Peninsula is supposed to be protected as a refuge for humans and wildlife alike. 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". The negative impact of these Naval practices would fall disproportionately on Native people's traditional lands. This is called environmental racism and we must not allow this in Washington. The Growler planes the Navy uses 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. Ground equipment for the planes emit intense electromagnetic radiation associated with all kinds of other health concerns. Please, for yourselves, for your children, for our communities, and for the safety of our delicate ecosystem, do not allow these war games to occur on the Olympic Peninsula. Too much is at stake.

- 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
- 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
- 9.a. Consideration of Tribes

Coupeville, WA 98239

I am writing out of grave concern for the health and safety of my family and my community with regard to the proposed increase in Growler or other operations at the OLF on Central Whidbey Island. I DO support the Navy, and have lived here (same location, in the flight path) for 22 years. When operations increase for a deployment, it can be deafening and painful and I am unable to enjoy or work the beautiful acreage I live on. I feel trapped in my home, where the noise is abated, but no one still can hear the TV, talk on the phone, sleep, listen to music, or hold a conversation. My home is built to required current noise abatement standards. The current frequency of flights has been at the maximum limit I consider tolerable. The noise is extremely disruptive to children during the school day, and my children's teachers were unable to communicate when the jets fly over this small town. The school was here, and families have lived here, long before the Navy constructed OLF. Enough is enough. We do not need more disruption in our lives and health. Property values were just beginning to recover after the 2008 banking fiascos, and are now flat-lining in my area, due to this proposed increase in flights/operations, the documented contamination to wells in the one mile radius around OLF, and unknown levels in multiple other wells in this vicinity (including my own, which we are in the process of testing). I support the Navy, but they do not have the right to poison my water, or the water of the livestock and crops I raise! I find it astounding that I have signed and had notarized, personal limitations that I will not stock animals within a 100 foot radius of my own well, but the Navy can dump perflourinated chemicals that bioaccumulate and do not break down, into our aquifer without issue. Levels below 70 ppt are still very TOXIC and we need to know exactly how much is in our water. I have worked in health care for 33 years, and I understand the danger and nature of such foreign chemicals. There's a reason I've never owned Teflon pans, ScotchGuarded products, or flame-retardant clothes (my children slept in cotton PJ's). Surely these fire-fighting foams are needed on carrier ships, but not in a National Historic Reserve with residents and reliance on agriculture to feed our local population! There must be less-toxic alternatives. Where is the APZ for OLF? What will that do to our property values and potential to continue to live our lives in this beautiful, historic location? It is a frustrating time to be a citizen in this country. Everyone seems to just want their own way, without concern for the health and future of others. I can only pray the Navy is more honorable than that... it would be refreshing. Is it wise to site ALL the Growlers in one area, particularly in this time of historic political uncertainty nationally and internationally? It seems more likely to elicit a single attack, not unlike Pearl Harbor. I would appreciate a personal response to this letter. I cared enough to write personally. Please demonstrate that you care enough to respond personally. It matters. Navy families live in Central Whidbey, too, and are affected by the operations at OLF. Respectfully, [REDACTED], PT

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.j. Property Values
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.f. Use of Public Comments
- 2.h. Next Steps
- 3.a. Aircraft Operations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 7.d. Recreation and Wilderness Analysis and Study Area

coupeville, WA 98239

#1 Noise averaging is inaccurate, maximum decibels is what is important, just like a rock concert. #2 To go from 6,100 to 35,100 flight operations per year will affect learning for kids (you can't hear the teacher) little league and other outdoor sports, quality of life for those who work and live around the field, tourism (It's a National Historical Reserve, not a Navy base). #3 For those who live within a mile of the field like I do, well contamination is an issue, dangerous contaminants were found in some ground water, generated by the Navy's use of chemicals, and no one knows how quickly they spread and travel in the groundwater. #4 After moving here 24 years ago, I recognize the field has been there historically, but the new generations of jets keep getting louder, increasing flights is the wrong direction. OLF's need to be on bases, or in remote areas, not in growing communities, since the decibel noise of the jets will only continue to increase, based on past history. The OLF is no longer an acceptable neighbor given the increase in decibel level.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 7.j. Impacts on Outdoor Sports

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.

THANK YOU FOR HAVING the input! It WAS ORCHESTRATED differently than expected but understand the NAVY's logic! Decentralize the protestors.

We moved to central whidbey for Peace, Quiet and tranquility - occasional propeller landings were expected and accepted! Contrary to your reports the growlers are LOUDER.

I can accept the current schedule of use at OLF but your projections for 38000 flights is totally abusive and unreasonable!

OAK HARBOR is the NAVY town not Coupeville. OAK HARBOR residents are directly recipients of the economical rewards of the base. Most residents are connected directly to the NAVY and knew very well the nature of operations which include jet landings and takeoffs, when they moved here. They apparently want central whidbey to experience the ill effects of the operations and reap the economical benefits.

Has there been any consideration to place the new growlers in La Moore CA? or Ft Centrop?

Thanks for your time and consideration!

And kudos to the personnel who faced the odious.

For more information, please visit the project website at 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 982139

Remember Pearl Harbor! Wouldn't it be wise to spread your arsenal around? The noise frequency is acceptable now but with projected options the noise will be unhealthy and unacceptable notwithstanding the crash danger.

- 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
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

LONG POINT MANOR, WA 98239

THE FREQUENCY OF FCLPS HAS BEEN ACCEPTABLE RECENTLY BUT THE NOISE IS GREATER THAN BEFORE. THE EIS INDICATES AN INCREASE THAT WOULD BE TOTALLY OUT OF LINE AND UNACCEPTABLE. THE DECIBLE NUMBER GIVEN IN THE REPORT IS NOT IN MY OPINION ACCURATE AND REPRESENTS AN AVERAGE. COME TO MY HOUSE WHEN A GROWLER FLYS OVER AND YOU WOULD AGREE.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.i. Points of Interest

coupeville, WA 98239

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.i. Points of Interest

the new plan is far too invasive of the people's right for relative peace and quiet. the current flights are loud but frequency acceptable. the projected increase is totally out of line. the decible count used in the eis is an average and not real. come to my house when fclps and you would agree

coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

the fly overs currently do not offend us that much but an increase to the degree that is suggested in the study would be difficult to deal with and could cause ill health mental and physical

Langley, WA 98260

I moved to Whidbey Island 15 years ago from Seattle to get away from the noise and pollution only to find that Whidbey Island is not as pristine as I thought. The noise from airplanes flying over my house has disturbed me day & night, (having to cover my ears) and infused the air with exhaust I can smell. Now I find out that the well water has high levels of PFOA's. I recently had cancer and am concerned about the pollution caused by the Growlers and other planes. Please consider our health!

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
4.r. Nonauditory Health Effects
6.c. Hazardous Air Pollutant Compliance

1.a. Thank You

Victoria BC Canada, British Columbia V8S 1S6

I live in Victoria BC the noise of these aircraft is intrusive and I would recommend a change in flight pact so that we do not hear this objectionable noise. Please desist from flying these aircraft close to Victoria BC.

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

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)
Homeowner

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
Involve me!

- 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

Comments

Check all that concern you. For additional information see 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)

- 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
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
 - b. U.S. Senator Maria Cantwell: 425.303.0114; www.cantwell.senate.gov
 - c. U.S. Congressman Rick Larson: 800.652.1385; rick.larsen@mail.house.gov
 - d. Governor Jay Inslee: 360.902.4111; governor.wa.gov

To Learn More

- ✓ To receive email updates, or to get involved, **email us** at coupevillecommunityallies@gmail.com
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at 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.

1.a. Thank You

Oak Harbor, WA 98277

To hell with those commie terrorist supporting ninnys.

1.a. Thank You
12.n. Quality of Life

Lopez, WA 98206

Please, no more growlers, Our lifestyle and nerves have been shattered by the ever present training at whidbey NAS. [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
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, WA 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.

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- Health effects from noise and low-frequency sound.
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- 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
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- 12.h. Tourism
- 12.j. Property Values
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- 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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- 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:

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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 very real possibility of further contamination to the Whidbey Island Aquifer is not adequately addressed in the DEIS. Toxic flame retardants are known pollutants to water, including the water of Puget Sound. Expanded flight operations significantly increase the likelihood of additional water contamination by flame retardants. Humans and wildlife will be adversely affected.

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

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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, resident, business owner*
[REDACTED] *Clinton, WA 98236*

3. Address *→* [REDACTED]

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.

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

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- 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:

I am concerned about the impacts of increased numbers of growler practices on recreation. Deception Pass Park is a heavily used park. When camping there, the growlers came over so often and so low, that we had to leave. It completely changed the environmental feeling of peacefulness, ~~and~~ People NEED our natural places to rejuvenate. How will the Navy minimize impacts to parks? To the waters around the San Juan Islands?

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1. Name [redacted]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)
citizen, resident, business owner
3. Address [redacted] Clinton, WA 98236
4. Email [redacted]

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Please include any additional comments and concerns here:

The final EIS needs to address the potential impact on CMS and CTS.

In addition, school children engage in outdoor learning activities, such as garden-based learning, Athletics and recess take place outdoors. The final EIS must include analysis of the impact on outdoor based learning. How could the potential increase impact student learning in outdoor programs?

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Please include any additional comments and concerns here:

Water contamination is a major threat to our agriculture. Farmers cannot water crops with water from contaminated wells. Health of people consuming food watered with contaminated water is at risk. The livelihood of farmers is at stake. Have you addressed these issues in the DEIS? How will farmers be aided and/or compensated as further contamination to the local aquifers is a real possibility?

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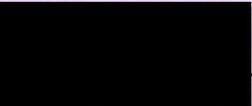
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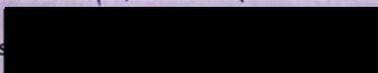
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- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

Given the strong and consistent evidence of jet noise on students' academic performance, what is the Navy's proposal for how to mitigate this impact on Coupeville's children?

The Navy needs to reexamine the No Action Alternative and explore other options for operations to be performed at other locations.

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Anacortes, WA 98221-9100

It is noted that noise issues/concerns have increased dramatically as noted in Table 1.9-5. We wish the lowest level of noise which would be Alt 2 - Scenario A Other recommendations: 1. More flights due west from Ault Field rather than north/northwest over Fidalgo Island. 2. No flights after 10pm on any day. 3. Require the growlers to fly at a higher altitude. Some fly quite low over westerly Fidalgo Island. More study needs to be done using actual noise collection and not rely upon noise computer modeling.

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative
- 3.f. Field Carrier Landing Practice Operation Totals
- 4.f. Noise Measurements/Modeling/On-Site Validation

Langley, WA 98260

- 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).

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

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").

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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.

Langley, WA 98260

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
- 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

Horified by Navy attempt to fool us with faulty research. These planes have NO PLACE on whidbey.

OLF should be closed entirely - the documented health harms, the truly unbearable noise alone should make it obvious - closure ONLY option!

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:
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YOUR INPUT MATTERS

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 2.n. Alternatives Considered But Eliminated

Portland, OR 97210

The Pacific Northwest is the site of our homes and businesses. We have made an investment in this area in order to live closer to nature, and our businesses depend on that. The Olympic Peninsula is the home to some of the most spectacular views in the world. And it is a National Park, which means it belongs to us, the people. This preservation of wilderness and wildlife habitat is needed to save life on Earth. Biologist E.O. Wilson states that we must have 50% of the Earth's surface in wilderness in order to survive on the planet for the long term. We live on land that really belongs to indigenous people, and we share the area with many Native Americans. They have sovereignty over their lands, and they care deeply about the wildlife that live therein. They support clean water and clean air. Bringing planes/equipment/personnel to this area for war games is unconscionable. The Navy has reportedly worked on its carbon footprint. Please don't bring it to a pristine and sacred area such as this.

1.a. Thank You

18.b. Average Carbon Dioxide per Aircraft

18.d. Washington State Greenhouse Gas Goals

19.e. Naval Special Operations EA

9.a. Consideration of Tribes

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; this is beyond despicable. Add to that the fact that 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. So now we have residents poisoned by their own wells as well as their health degraded by noise. Housing/business valuations will plummet and then you have to wonder if business, ie tourist trade, will also plummet. You ought to be ashamed of yourselves for even considering this new growler activity. It's bad enough as we currently have it.

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
12.f. Economic Hardship and Impacts
12.h. Tourism
12.j. Property Values
4.q. Potential Hearing Loss

Greenbank, WA 98253

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

Averaging exposure does not acknowledge the problem: the effects of peak, multiple peak, exposures. It is obvious, even sans instruments, that the Growler is louder than the Prowler. 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;** 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 home owner
- 3. Address [REDACTED], Coupeville
- 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 use of a 24-hr. measurement of noise, even though mandated by law, is not a useful measurement of noise in a one, two, three hour period. The ear does not store noise and download it every 24 hrs.

Why is not the Navy, ~~we~~ have aeronautical engineers work on methods to mitigate noise at take off and landings of the new Growlers. They certainly do cost enough to make this investment economically feasible.

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.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation

Coupeville, WA 98239

1.a. Thank You
11.d. Per- and Polyfluoroalkyl Substances
2.m. Record of Decision/Preferred Alternative

I've lived in Washington since 1978, and moved to Whidbey in 2004 upon my retirement. We were well versed with the Navy and OLF, and have enjoyed the flyovers we've had, some of it very exciting. As long as you do NOT increase the number of flights at OLF - I'm a happy camper. HOWEVER, if you choose to increase the flights from OLF by 80%, you have definitely lost any support/good will from my husband and myself. I am also perturbed about the contaminated drinking water in the area. Now we all know that personnel in the Navy come and go, the majority of the Navy folk "go back home" at the end of their stint on Whidbey. But for US - this is OUR HOME and we can't move away. We did not sign up for increased flights over our house, and we DON'T WANT the extra noise. I don't like the noise/pollution/fuel outflow you're bringing to OUR HOMES. Remember - this is OUR life also, and we're the ones who do not get to "go back home", this IS our home. Please, no additional flights at OLF.

La Conner, WA 98257

Growler Expansion and Increase of Noise Nuisance Concerns I recently attended the Open House in Anacortes, WA to learn more about the proposed increase of 35-36 more Growlers over our air space. I am very opposed to this increase for the following reasons: Example on Dec 10, 2016 we were startled awake by Growlers flying low overhead (we leave on a beach cliff) at 8:37AM, every 15 minutes another screaming loud jet went by until mid afternoon. Do we not have the right to have peace and quiet on our weekends, after a long work week and taking care of our adult disabled son? It is such a horrid invasion of privacy and inherent right to seek "life, liberty and pursuit of happiness". These Growler fly by strip all of the residents here of that. I learned that the flight pattern for take off and return from NAS Whidbey is to fly right over La Conner and return the same way. WHAT WILL IT BE LIKE WITH 36 MORE??? It will be like it was a year ago for one solid month we were awakened at 6AM with fly bys finally ending by 11PM every single day! That is enough to drive the sanest person crazy! It is so loud that you cannot carry on a conversation in our own house, hear a phone conversation or hear the TV! Everything has to stop or you have to leave your home! Is that reasonable? I pay a lot to live here and now the Navy can take away my freedom to enjoy what I work hard for everyday?? We have lived here for many years and moved to La Conner 6 years ago with the understanding that the Ault Field was in declining use and there were many news articles that reported NAS Whidbey could even be moth balled. At the Open House they showed the graph of decline in use since the 90s, over 30 years ago, a generation of decline - why would the general public expect a sudden reversal and be told at the Open House that they were hoping to gear back up to the peak of use as in the 1980s! Unthinkable on many issues. Transportation: We live in a very rural small community, with just the increase in naval population over the last two years, HWY 20 at Sharp's Corner has seen such an increase in traffic going to and from east and west on HWY 20 that often, morning and evening there is traffic backed up half a mile or more. It took WA State DOT 20 years to set aside funds to make improvements to this portion of HWY 20 - finally completed just 5 years ago and now we have the worst traffic ever all due to NAS Whidbey Naval base - I ask what is the Navy's responsibility to fund infrastructure to small rural communities that your population has taken over?? What used to take a 20 minute drive over Deception Bridge now takes an hour coming or going ANY time of day of the week, it's insane! Why the NAS staff that manned the Open House in Anacortes were stuck for over two hours due to an accident near Deception Bridge. The State will not replace or enlarge that bridge due to it's historic registry, nor should it be. At the Open House I was told by one of the staff there, " Most of us come from HI and the traffic there is horrible and we think this is just great, we don't mind the back up traffic here compared to what we are used to it's nothing." Excuse me, we did not move here long ago to experience traffic jam and noise pollution because the Navy prematurely decided to close bases where the populations in CA and HI and the Phillipines have been long accustomed to such intrusiveness. Just because the transferred staff think it's great here compared to where they were MOST of us do not think it's great nor do we want to be forced to have our way of life change because the Navy made decisions to increase use of NAS Whidbey when the general population for 30 years has seen a decline and moved here based on that decline. One can only imagine how much worse it will be with the

- 1.a. Thank You
- 12.i. Housing Access and Affordability
- 14.a. Transportation Impacts
- 14.b. Vehicle Collisions and Safety
- 15.a. Infrastructure
- 2.n. Alternatives Considered But Eliminated
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 6.b. National Ambient Air Quality Standards Compliance
- 7.a. Regional Land Use and Community Character

proposal of 36 more Growlers. Is it reasonable that on the backs of a small rural population that our HWY taxes will increase to provide improvements to HWY 20 for NAS Whidbey personnel? This is the Navy's responsibility and whether or not you do increase to even higher levels than you have to date, you need to take on funding of road improvements to Sharp's Corner and make it safe again and you need to find solutions and FUND improvements to Oak Harbor. Coupville and Langely are favorite destination places for many long time residents and you are ruining it, because of the overburdened roadways by your personnel and families. NAS Whidbey needs to keep personnel on base- this would alleviate the other onerous issue the current growth has caused and the proposed growth will exacerbate: HOUSING The Navy encourages it's officers to seek housing in Anacortes away from the enlisted men. Thanks to that and the fact they receive a housing stipend to offset the cost of housing, MANY, MANY people who have been born and raised in Anacortes and Skagit Cty are being forced out due to the fast increase in housing costs. NONE of us receive a "housing" stipend to offset costs of inflated house prices. You say the community welcomes NAS Whidbey -uh no they do not- I know at least 1200 people who have long lived here and they are not in favor of this increase whatsoever. The ONLY people who welcome this are greedy landlords, real estate developers and folks who want to sell their property for over inflated prices and leave, fueled by your personnel receiving stipends that are funded by who- oh yes, us tax payers! Housing in Anacortes is at an all time high, \$100,000 more than any other community. Anacortes is quickly losing it's charm and small town atmosphere- everywhere you see naval folks with their values and culture being imposed on a quaint and once quiet, lovely gem. ANY town or city that is in close proximity to a growing military base soon is over run by that culture and riddled with all the problems that are evident in Tacoma, Anchorage, Camp Pendelton, Edwards, San Diego, etc etc etc. PLEASE, fund housing for officers and enlisted men on the base as you have in the past and stop this hideous change to our rural communities that we have treasured for so long. PLEASE, reconsider your options and place your 36 additional Growlers in North Dakota- or Guam- they do welcome you - the ever shrinking population there begs for anyone to move there. They advertise for move ins! Air Pollution We are already suffering from the plague of two oil refineries and the fouling of the air they impose on this community. Anacortes and Swinomish Indian Tribal Community and Guemes Island residents have much higher levels of child hood and adult cancers, asthma and other respiratory issues than populations not living in close proximity to oil refineries have. Now add the verifiable air pollution that Growlers produce, condensed over a population that suffers poor health such as the Swinomish Reservation and the elderly retirement community of Shelter Bay- simply unconscionable that a branch of the US military would do that to it's own citizenry. I hope my words have not fallen on deaf or unreceptive ears and that you will do the right thing for all the people who live in this valley and on Fidaglo Island. NO MORE INCREASE and fund transportation and school infrastructure for the increase you have already imposed on us. Fund base housing and keep personnel and staff on site and stop the artificial inflation to housing costs. Do not increase health risks with more air pollution. Let us live in peace and quiet that we have worked hard to enjoy. As an aside, my husband lost two uncles on the US Arizona, an aunt and uncle during that attack. The Heidt boys- look it up- they have been featured on TV documentaries as a remembrance. Thank you.

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

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

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.

Freeland, WA 98249

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

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.

Freeland, 98249

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

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).
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.
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7. 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.
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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.
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
- 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
- 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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- 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.d. Environmental Health Risks and Safety Risks to Children
- 7.c. Noise Disclosure

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

February 23, 2017

RE: Comments on EA-18G Growler Airfield Operations
at NAS Whidbey Is Complex DEIS

Please find attached comments on the above DEIS for consideration.

██████████
Fisheries Biologist

██████████
Portland, OR
97213

- 1.a. Thank You
- 10.m. Impacts to Marine Species and Habitat
- 12.c. Socioeconomic Impacts
- 18.a. Climate Change and Greenhouse Gases
- 18.d. Washington State Greenhouse Gas Goals
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.a. Purpose and Need
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 6.b. National Ambient Air Quality Standards Compliance
- 9.b. Native Food Resources and Tribal Fishing Grounds

Comments on NAS Whidbey Island Complex Growler DEIS

General Comments

The DEIS failed to adequately consider the surrounding natural environment and socio-economic values including health and welfare of the surrounding communities. The considerations in this DEIS only address the military benefits of increasing military capacity at the Whidbey Island complex. An EIS should fully describe the effect of proposed actions on the natural, physical environment and the relationship of that environment with social, cultural and economic aspects.

The DEIS has failed to reasonably evaluate the effects of the proposed action on the above human dimensions to make an informed decision.

The DEIS cumulative effects analysis is incomplete and lacking. Direct and indirect impacts to specific resources, past, present and foreseeable future actions with project effects added to other projects are necessary to determine magnitude and extent of cumulative effects. For example, the DEIS states that the decisions affecting future conditions affecting the NAS Complex have already been made such as Ault Field events regarding facility and number of aircraft and personnel and that these conditions for a baseline for consideration of the proposed action of adding additional aircraft, construction and personnel. This is tiering a proposed action decisions that have already been made. The cumulative effects of both the proposed action, past decisions that have already been made and future foreseeable actions need to be fully vetted, but have not in the DEIS.

The DEIS failed to adequately consider other sites for the proposed action that are already developed and could function with less overall impacts than the site of the proposed action.

The DEIS failed to provide an adequate, detailed military assessment as to why the proposed action is really needed to defend the U.S. The Navy is charged with sea operations, not land operations. There should be other alternatives and if they were rejected the DEIS needs to describe them and provide a rationale why they were not pursued.

The DEIS did not describe impact categories on a scale, i.e. four levels of environmental impacts:

- Negligible
- Minor
- Moderate-impacts moderate intensity independent of duration with significant or unique resources potentially affected on either local or regional scale

- Major- impacts of high intensity and/or long term or permanent duration of local or regional extent that affect culturally ecological or unique /rare resources

General DEIS Deficiencies

- Significant unavoidable impacts are not fully described- they may be moderate or major in duration or degree even after all mitigation measures have been applied that are identified.
- Cumulative impacts- lack of climate change assessment based on updated and best scientific information
- Socioeconomics and culture- inadequate description and support of conclusion of disproportionate effects and consummate mitigation identified for environmental justice populations- no mention of impacts to tribal economies from the potential loss of fish and wildlife populations on tribal culture and health; insufficient description and mitigation for impacts to socioeconomic resources including employment and tax revenue

Biological Resources

The proposed action would increase the spatial and temporal impacts of jet operations on the Olympic Peninsula land and aquatic biota and their habitats with increased noise, air pollution drifting to land and water sources and activity to one of the most pristine areas left in the world. The DEIS failed to consider proposed action impacts on Pacific lamprey, an ancient fish that has been the foundational species in PNW rivers contributing to marine nutrients in these watersheds and is in serious decline and threatened with extirpation (USFWS 2007; USFWS 2011). Pacific lamprey life history functions are particularly dependent on olfactory cues that could be impacted by increases in aerial distributed pollutants in watersheds envisioned by the proposed action.

While the DEIS states that increase in aircraft activity may cause sensory disturbance to marine animals, it appears to be limited to marine mammals. It is important to note that ESA- listed salmon and steelhead and non-ESA listed Pacific lamprey inhabit marine habitats for years as an essential part of their life histories. Further the DEIS acknowledges that marine and land species have already been exposed to some level (but not the cumulative and synergistic levels) of noise cause by Navy jets and presumes without any referenced to the scientific literature that the array of marine biota exposed to additional noise and distributed aerial pollutants in watersheds such as hydrocarbons from jet operation from the proposed action would adapt to these impacts. Although there is literature in the DEIS reference section regarding noise impacts to aquatic biota, the DEIS fails to specifically cite to scientific information regarding to and supporting this presumption. There is scientific literature that suggest otherwise. For example, Smith et al. (2004) showed that fish exposed to noise had elevated level of cortisol, a stress hormone, days after noise events. Elevated cortisol levels have been shown to

increase fish vulnerability to other stressors increasing propensity of disease and susceptibility to predators (Schreck et al. 1997; Barton et al. 2002). Popper (2011) noted that lower frequency sounds could impact fish behavior and physiology. Wellgart (2007) concluded that noise pollution is a special concern for whales and urged precaution in assuming no impacts on whale necessary life functions. These issues should be addressed in a supplemental DEIS.

Socio-economics

The DEIS failed to assess the natural and human economic capital of the Olympic Peninsula and the socio-economic value of the Peninsula that would be impacted and degraded by increased jet facilities and operations. The proposed action will increase jet noise and pollution within Olympic National Forest, Olympic National Park and surrounding communities and will impact one of the least populated and most pristine areas in the world, negatively impact regional recreational, sport fishing and tourism economies. There is no mitigation offered in the DEIS for these serious impacts. These impacts need to be addressed in a supplemental DEIS with mitigation options specified.

Hazardous Waste and Noise

The DEIS fails to address the noxious gases created by and distributed over large pristine areas from increased jet operations over these areas. These pollutants have human and ecological health consequences. The DEIS (DEIS at 4.46) states that the scientific literature shows no correlation between increased noise and impacts to human health- especially children, but assumes that the majority of time that residents spend is indoors (87%). This assertion is not realistic for residents of the Olympic Peninsula that spend much more time outdoors than DEIS cited assumption rates.

Climate Change Impacts, Consequences and Lack of Mitigation

The DEIS is inadequate in describing scientific climate model projections which are based climate impacts from global emissions (Figure 1) in relationship to the proposed action such as specific climate impacts projected for the proposed site and operations. For example, the DEIS only refers to impact projections to the 2040s where the proposed action will impact climate change well into the end of the century and beyond. More recent climate global circulation models from the International Panel on Climate Change (CMIP 5) include atmospheric and oceanic circulation models and treats GHGs as representative concentration pathways (RCPs) that include methane, aerosols and other climate change gases. The additional warming effect that will influence the site and surrounding Olympic Peninsula hydrology and flooding is likely substantial (National Climate Assessment-Pacific Northwest Chapter 2014; Tohver and Mote (2010).

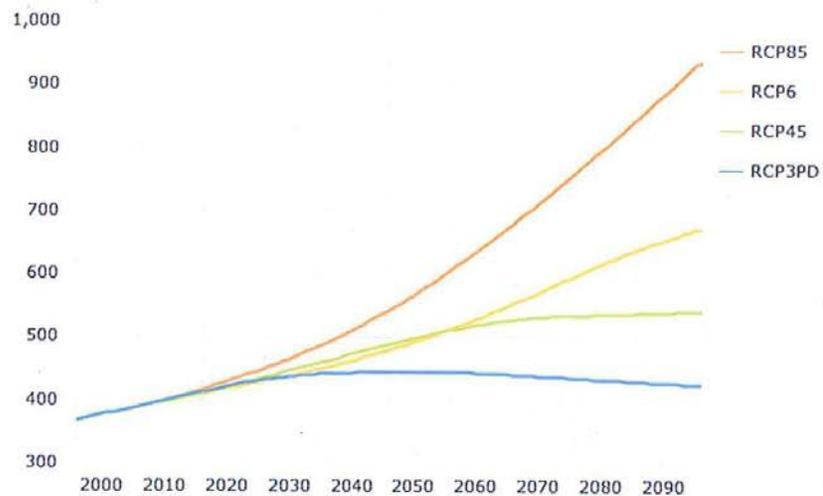


Figure 1. Representative Concentration Pathways projections of greenhouse gas emissions through the 21st century, based upon the International Panel on Climate Change 4th Report (Rupp 2014). The current world path is RCP 8.5. The proposed action without mitigation will contribute to this path.

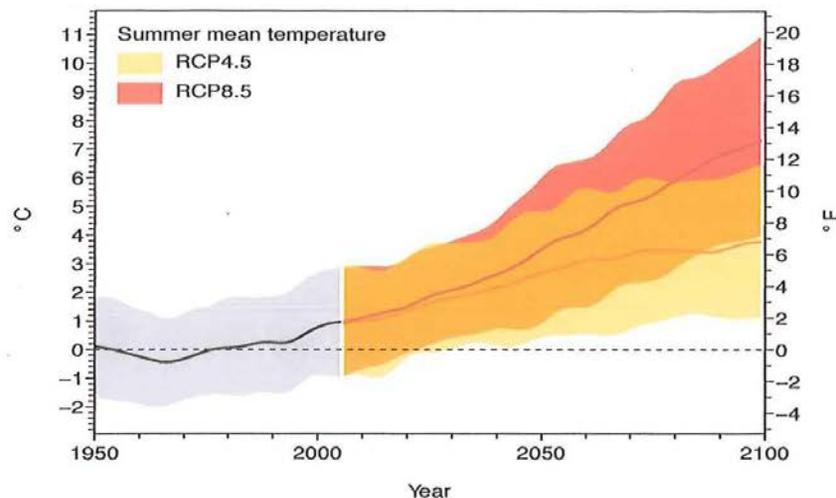


Figure 2. Projected Air Temperatures in the Pacific Northwest under two representative concentration pathways downscaled from CMIP 5 global circulation models. The current path based upon updated GHG emissions is the RCP 8.5 trend line that would result in air temperatures increasing by about 11 degrees C by the end of the century. The DEIS failed to include these specific projections with respect to the proposed action. From D. Rupp, Oregon Climate Change Research Institute 2014.

The DEIS states that the proposed action creation of GHGs “should not have a significant impact on Washington GHG goals”(DEIS at 4.16), but offers no assessment why this is the case. The proposed action’s creation of GHGs must be examined in context with updated Washington State emission limit criteria that comports with updated climate science and international assessments. This includes the recent global climate change pacts that indicate that without substantial reductions of GHGs, global temperatures are projected to increase by 2 degrees C which would cause melting of global ice sheets, sea level rise, extreme droughts and floods and other serious consequences for the world community. The DEIS is dated as it does not contain information recently generated from the historical Paris international climate change pact. The Pact, strongly advocated by the U.S., calls on the developed countries to, “.... achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gasses in the second half of this century” indicating that much of the world’s remaining reserves of coal, gas and oil must remain in the ground. For the Pacific Northwest, such impact projections include extreme low river flows and summer temperatures with major consequence for human and ecological systems (Dalton et al. 2013; Hamlet and Lettenmaier 2007; Mote and Salathe 2010; Tohver and Mote 2010).

While the DEIS refers to the State of Washington 's integrated climate response strategy, "Preparing for a Changing Climate" (Ecology 2012; Publication No. 12-01-004), it only provides brief strategies from that report.¹ that notes that if substantial actions are not taken to reduce GHGs, impacts to Washington State are projected to reach "nearly \$10 billion per year in costs to human health, storm damage, coastal destruction, rising energy cost, increased wildfires, drought and other impacts." As evidenced in 2015, impacts from low flows and high temperatures resulted in massive salmon losses that directly impacted and degraded non-tribal socio-economics and tribal socio-economic and treaty resources. Ecology, in a report to the Washington Legislature, recommended that Washington State GHG emission limits need to be adjusted to better reflect current science and that the results of the December 2015 Paris Climate Change Pact should be used to better inform how Washington's limits should be adjusted to meet state, national and international targets (Ecology 2014- Publication 14-01-007).

This is consistent with the recommendation of the Carbon Emissions Reduction Taskforce (CERT) Report to the Washington State Governor's Office (CERT Final Report, November 14, 2014) that emission limits need to be "...updated based on the science on human-caused climate change reported in global or national assessment of climate change science". The emission criteria guidance stated in the DEIS is dated from a 2011 Ecology report and is not likely consistent with new GHG emission limits from new scientific assessments.

In Executive Order 14-04, Washington State Governor Jay Inslee established the Carbon Emissions Reduction Taskforce (CERT). Among other things, the task force needs to respond to the University of Washington's finding that "decisions made today about greenhouse gas emissions will have a significant effect on the amount of warming that will occur after mid-century". The Taskforce responded by creation of a report to the Governor's office submitted on November 14, 2014. A major tenet of the report was the creation of a carbon reduction emissions program to "establish a cap on carbon pollution emissions with binding requirements to meet statutory emission limits" established by the legislature. The DEIS fails to provide any assessment of proposed project GHGs related to meeting these statutory emission limits, and provides no mitigation for proposed project GHGs over the rest of the 21st century.

¹ It is interesting that the DEIS includes the State of Washington 's integrated climate response strategy, "Preparing for a Changing Climate" objective to "Safeguard fish, wildlife, habitat and ecosystems.." but fails to provide any proposed action mitigation measures for climate change to assure this strategy can be met in the proposed action.

Figure 2. Washington's Historical GHG Emissions, Business-As-Usual Projection, and Emissions Limits.⁸

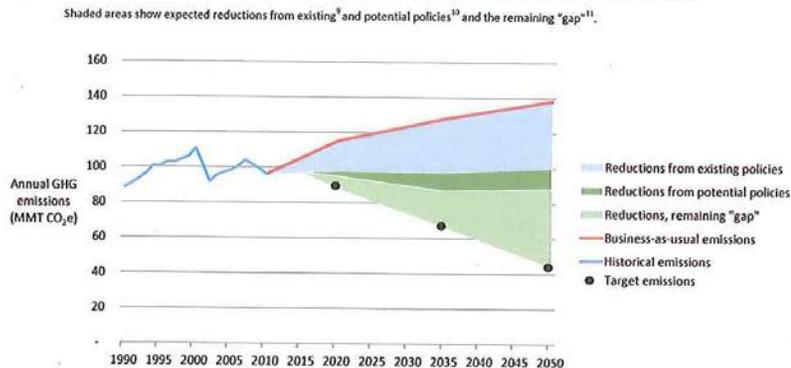


Figure 3. Washington State GHG Historical and Future Projections and Emission Limits. From Washington State Carbon Emission Removal Task Force Final Report to the Washington State Governor's Office, November 2014).

In a November 10, 2014 letter to the Governor from the Taskforce, the group stated that Washington State was not on track to meet Washington State GHG emission limits, committed to by state law. The group identified transportation as the largest source of GHG emissions in the State, comprising almost 50% of the State's emissions. Without a proper compensatory offset that could likely be more than the 12% stationary source reduction based on updated climate and GHG emission science and intergovernmental obligations, the proposed action could substantially violate updated emissions restrictions, setting the State further from necessary and legal limits.

The proposed action's creation of GHGs must be reexamined in context with updated Washington State emission limit criteria that comports with updated climate science and international assessments. This includes the recent global climate change pacts that indicate that without substantial reductions of GHGs, global temperatures are projected to increase by 2 degrees C which would cause melting of global ice sheets, sea level rise, extreme droughts and floods and other serious consequences for the world community. The DEIS does not contain information recently generated from the historical Paris international climate change pact. The Pact, strongly advocated by the U.S., calls on the developed countries to "... achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gasses in the second half of this century" indicating that much of the world's remaining reserves of coal, gas and oil must remain in the ground.. For the Pacific Northwest, such impact projections include extreme low river flows and summer temperatures with major consequence for human and ecological

systems. The DEIS proposed action will result increased acquisition, transport and burning of fossils fuels that will contribute to global GHGs and increased climate change impacts, and fails to quantify the total GHGs created by the acquisition process over decades.

While increased summer temperatures are also mentioned in several recent reports as an impact of future climate projections,² the DEIS in Section 3.2.4.5 (Climate Change) does not quantify this impact, yet there is scientific literature available that does (EPA. 2014; Mantua et al. 2010). With respect to cumulative project effects, the DEIS fails to mention, much less analyze likely synergistic effects of high river temperatures, with corresponding extreme low flows on fish habitat and populations, to which the proposed action without mitigation will contribute.

The DEIS notes that the proposed action will increase greenhouse gases (GHGs) by 3% by proposed action site impacts and 17% for mobile operations³ but fails to provide any specific mitigation measures⁴ and simply refers to a very broad DOD annual Strategic Sustainability Performance plan that has goals but lacks specific implementation of mitigation actions relative to the proposed action (DEIS at 4.16.3.2). Overall, the DEIS lacks qualitative and quantitative scientific climate change information that relates the impacts of the proposed action to the best available climate change projections that call for serious GHG reductions, particularly from jet operational sources, necessary to avoid serious climate change consequences. Thus, simply stating that the proposed action over decades should not have a significant impact on Washington GHG goals and the natural and human environment without a rigorous assessment is an unsubstantiated assertion.

Summary

² *Preparing for a Changing Climate* (Ecology 2012; Publication No. 12-01-004; National Climate Assessment (2014); Northwest Climate Assessment Report 2013; Climate Change in the Northwest- *Implications for our landscapes, waters and communities* (Dalton et al. 2013)

³ The DEIS at 4-291 states that “regional GHG emissions inventories that include military aircraft emissions are not available” so that state sector totals were used as a reference scale. It is vital that the data for the regional military aircraft GHG emission be included to provide a direct comparison with proposed action GHGs. A supplemental DEIS should address this deficiency.

⁴ Mitigation alternatives should be provided in a supplemental DEIS and could include carbon trading, and reduction of GHGs from other Defense Department structures and operations in the site area. This would not be necessary for the no-action alternative and alternative 1 would require the least amount of GHG mitigation.

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LOPEZ ISLAND, WA 98261

\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. I am aware of real estate purchases that were withdrawn because of jet noise, after a sales agreement had been signed. 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. Several marine species that will be affected are not included in the analyses, and models rather than empirical data have been used in determining impacts. 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.

- 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
- 4.t. Noise Mitigation

1.a. Thank You
10.m. Impacts to Marine Species and Habitat

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: Wednesday, December 7, 2016

PLACE: Lopez Center for Community and the Arts
204 Village Road
Lopez Island, Washington

TIME: 3:00 p.m. to 6:00 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

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* * *

(The personal identifiable information disclosure statement was read by the following commenter.)

MR. [REDACTED]: I have read the statement about all comments submitted under the draft EIS will become part of the public record and will be addressed in the Final EIS, et cetera.

So I was just at the station about natural resources, and I'm concerned that impacts on marine mammals, especially the orcas, will be based on modeling data from

1 the sound transmission measurements and that apparently
2 there is no plan to actually observe the behavior of animals
3 as Growlers are going overhead because modeling data models
4 only with what the data go into it are. And if there's no
5 actual data on behavior of animals, then pretty much it's
6 just purely speculation and you can say anything you want
7 because I've written and developed models myself.

8 In addition, at the station there only humpback
9 whales and killer whales were mentioned. No mention of
10 pinnipeds, harbor seals, Stellar sea lions, California sea
11 lions, elephant seals. All are in our waters, as are minke
12 whales, white-sided dolphins, Dall's porpoise, harbor
13 porpoise. These are all animals that frequent these waters
14 and can be potentially affected. So to come to a conclusion
15 that there would be no adverse effect is premature, and
16 without actual empirical data on behavior of the animals you
17 really can't make statements about the effects.

18 * * *

Coupeville, WA 98239

1.a. Thank You

2.n. Alternatives Considered But Eliminated

I would like to see the FCLP's that are now currently allowed at 6,120 per year go no higher than that. The new planes are even louder than the old model.

Coupeville, WA 98239

1.a. Thank You

2.n. Alternatives Considered But Eliminated

You have Smith Island why don't you turn it into your touch and go landing strip? That would be far less impact on noise on Whidbey Island.



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
2. Organization/Affiliation One Square Inch of Silence Foundation
3. Address Joyce WA 98343
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 have carefully reviewed the information offered at the public hearing today at Fort Warden. I am concerned at the lack of modern scientific methods and the numerous misleading statements. Why have you left areas of science unaddressed such as noise impacts on non-auditory health, and why do you quote noise levels (65) as acceptable when that threshold has been abandoned in responsible research for decades. These exhibits pretend to know when in fact they are misleading. The World Health Organization's standards were not employed nor even considered.

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.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 4.d. Day-Night Average Sound Level Metric
- 4.r. Nonauditory Health Effects



Public Meeting Comment Form

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1. Name [REDACTED]

2. Organization/Affiliation _____

3. Address [REDACTED] Port Hadlock WA 98339

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

Please choose the No Action Alternative

① we dont need 34 or 35 new growlers

② we dont need to double the flight operations @ whidbey Island

③ Burning kerosene & new metal fabricatin all add to global climate change.

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
- 18.a. Climate Change and Greenhouse Gases
- 2.a. Purpose and Need
- 2.1. No Action 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.

(4) These toys will belong to Dudd Drumpf in Jan 21 2017 why would you stay in the military? Retire with honor before disaster. Please.

For more information, please visit the project website at 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

Friday Harbor, WA 98250

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.

Clinton, WA 98236

1.a. Thank You

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

I was raised on Whidbey Island from the age of six, and, while I have often lived away, have never found a place that is as close to my heart as Whidbey is. Ebey Landing and Ebey's Prairie are spiritual landscapes for me, and, while I've traveled widely, my favorite and more important place in the world - I return there, year after year, on birthdays, new years, mothers day, when I am happy or sad, when I was engaged to be married. The way the land meets the sea there is more than just a soul-renewing beauty (which it also is). It is a kind of gateway to peace. To have naval air operations over this place of peace, breaking the quiet and the beauty of it with machines meant for war, would destroy it for me and for the many, many others I know who also go there for relief and release. We need spaces like this in the world. Please consider these deeper needs - the needs of an environment that includes the human mind (or spirit, or soul, whatever you want to call it) that often requires quiet communion with nature to refresh and renew itself.



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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 _____

3. Address [REDACTED] Anacortes, WA 98221

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

The meeting was very informative! We were really impressed at all the presentations, and were extremely pleased with all the research that has gone into the EIS!

We appreciate our military and look forward to welcoming all the new personnel and their families!

Thanks for caring about the public opinion!!

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

[REDACTED]
On Guemes Island
Anacortes, WA 98221-9093
E-mail: [REDACTED]
Phone: [REDACTED]

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.h. Species-Specific Discussions
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 2.a. Purpose and Need
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

January 10, 2017

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

Dear Project Manager:

As a whole, the EIS document and the quality of the analysis are thorough, with exceptions noted below. My comments primarily concern noise impacts, which directly impact our neighborhood.

I have not addressed other items for the following reason: I wonder if this EIS is only an obligatory step by the Navy, after which I expect the Navy will proceed as planned. Therefore, I consider a thorough analysis of the entire document to be a useless act.

The document fails to address the noise impacts throughout the region, and the document minimizes noise impacts as a mere "annoyance." Apparently the consultants consider residents of Guemes Island as unimportant, so your noise contours ignore us. From my own experience with noise issues, I believe the noise levels here could be significant, and should be investigated. Table 3.2.1 indicates 90+ dba as "very loud" and 110+dba as "uncomfortable." I have seen other such tables that include a threshold of pain. As a minimum, noise levels here are "very loud."

I suggest that the consultants and/or base commanders visit our neighborhood on Guemes Island when flights are occurring before telling us that they are a mere "annoyance." Most flights occur in the evening when we are indoors. When NAS Whidbey aircraft are flying, the noise drowns conversations or any other sounds. All activity is forced to stop while the aircraft noise persists.

I am concerned about the impact of noise on eagles and other species of birds, as well as on orcas and other sea life. In the interest of brevity I would point out one example regarding forestlands of March Point in Anacortes, Washington, between Fidalgo Bay and Padilla Bay. That area is home to one of the largest groups of nesting Great Blue Herons on the west coast.

You are probably aware of the Washington State noise law. I recognize that the State cannot regulate the federal government or its military, but it is worth noting that no public or private entity would be allowed to create that amount of noise in this State.

The EIS does not address the impact of noise on property values. Clearly, our property values are diminished by all this noise, which amounts to a taking of property values without compensation. Any buyers would be wary of purchasing homes impacted by such noise. In other localities, expansion of airports and/or airport activity has involved reimbursement or removal of homes thus damaged.

In conclusion, I question whether this project is even needed. If all this is truly necessary for defense, many of us would willingly accept it, regardless of its impact on us, but we remain skeptical of the need. It seems similar to the Growler replacing the former Prowler, regardless of the noise impact. We have not been attacked from the Pacific, so the Prowler must have conducted the mission adequately, but it was replaced anyway.

Sincerely,

A large black rectangular redaction box covering the signature area.

Seattle, WA 98126

Operation of these planes over the Olympic Peninsula, Whidbey Island, and over waters adjacent the the land are likely to have negative impacts on migratory and locally breeding and/or nesting species including several endangered species. The EIS needs to fully document potential impacts to each species of wild animal that is likely to be in the area at any time that flights are planned or anticipated. This documentation should include current census figures for each species, health and viability of each population and sub-population and all research related to the affects of low-flying aircraft, jet noise, exhaust plumes, possible fuel dumping, live fire exercises, mock warfare, and any other observable impacts of flights by EA-18G Growler flights in the area.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.h. Species-Specific Discussions
- 11.c. Marine Waters and Sediment
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.f. Fuel Dumping
- 6.g. Chaff

Port Hadlock, WA 98339

I would like to add my voice to those protesting any increase to the Growler activity. I live very near the tip of Marrowstone Island and in the summer I must keep my windows closed and wear ear plugs to sleep. We have no AC (as we live in such a temperate climate). We moved here 17 months ago and deliberately avoided purchasing on Whidbey Island BECAUSE of the Growlers! So sad that they choose to do the bulk of the exercises when the weather is so nice and the tourists are here. Btw, we stayed at the RV park at Deception Pass when we arrived and were shocked by the noise. We resorted to packing up the dog and spending several hours at the drive-in movies to escape the relentless and overwhelming cacophony! I fear that any expansion of the Growler exercises will lower our property value as it has to the properties on Whidbey. While I understand that Navy was on Whidbey long before it became quite so populated, it is unfair to expand their audio assault to any new areas. I strongly urge the Navy to limit their exercises in this area and move them to someplace more remote...how about the deserts?

- 1.a. Thank You
- 12.j. Property Values
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 4.l. Points of Interest
- 4.p. Sleep Disturbance
- 7.i. Deception Pass State Park and other State Parks

1.a. Thank You

coupeville, WA 98239

WE love our GROWLERS. We live right under there flight pattern. This is part of living on Whidbey Island.. With the world situation we are the fortunate ones to have NAS in our back door

1.a. Thank You

coupeville, WA 98239

WE love our GROWLERS. We live right under there flight pattern. This is part of living on Whidbey Island.. With the world situation we are the fortunate ones to have NAS in our back door

Clinton, WA 98236

I urge the US Navy to exhibit caution -- and precaution -- in assessing the impacts of noise on residents, especially children. The Executive Summary of the EIS states: "Based on the limited scientific literature available, there is no proven positive correlation between noise-related events and physiological changes in children." (page ES-6) This is not a green light to disregard evidence. First, lack of evidence does not mean there is no effect; it might mean that proper studies have not been conducted. There is mounting evidence that sustained noise above 85 dB(A) is associated with hearing loss (Centers for Disease Control and Prevention. Understanding Noise Exposure Limits: Occupational vs. General Environmental Noise. September 6, 2016, <https://blogs.cdc.gov/niosh-science-blog/2016/02/08/noise/>), and lower levels of noise can produce sleep disturbance, cardiovascular effects including heart attacks and stroke, learning impairment, psychophysiological effects, psychiatric symptoms and impaired fetal development. Noise also has widespread psychosocial effects including noise annoyance, reduced performance and increased aggressive behavior. (Babisch W. Noise and health. Environmental Health Perspectives. 2005 Jan;113(1):A14-5; Frank L, Kavage S, Delvin A. Health and the built environment: a review. The Canadian Medical Association. 2012, http://www.wma.net/en/20activities/30publichealth/30healthenvironment/Built_Env-Final_Report-August2012.pdf; Münzel T et al. Cardiovascular effects of environmental noise exposure. European Heart Journal. 2014 Apr;35(13):829-36.) A 2016 study found that the risk of myocardial infarction (heart attack) rose with exposure to road noise or railroad noise. The association was strongest, and extended to airplane noise, among those whose heart attacks were fatal. (Seidler A et al. Myocardial infarction risk due to aircraft, road, and rail traffic noise. Deutsches Arzteblatt international. 2016 Jun 17;113(24):407-14.) Second, the term "proven" is problematic without definition. There are many, many cases of issues with overwhelming scientific evidence that can still be considered unproven by some definitions. It is unlikely that proof will ever be iron-clad, but that does not justify a high probability of causing harm to people. I serve on a council at WhidbeyHealth Medical Center and meet once a month there. During the milder months, I drive part way from Clinton to the hospital and ride my bike the rest of the way. Last summer as I rode Route 20 and up Engle Road, a jet made 2 passes overhead. The noise was very uncomfortable for me and crossed the threshold of pain for several seconds. I was unable to cover my ears while riding my bike, but I came very close to stopping just to do so. I gained a great appreciation for the noise levels that Coupeville residents experience daily and am very concerned about the impacts on health and quality of life with the proposed increases in EA-18G "Growler" airfield operations. I am adamantly NOT anti-Navy. The Navy is an integral part of Whidbey Island. However, we all need the Navy to be a good neighbor, not letting its big, barking dogs loose all over the neighborhood. If there are technical fixes that can reduce the noise impacts, if there are buffers or better routes or other land-based solutions to ameliorate or reduce impacts, then the Navy has an obligation to enact these. If not, the Navy should reconsider such a huge increase in Growler airfield operations. Thank you.

- 1.a. Thank You
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.t. Noise Mitigation

[REDACTED]
 [REDACTED]
 [REDACTED]
 Lopez Island, WA 98261
 [REDACTED]

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.k. Comparison of the Prowler to the Growler
- 4.l. Points of Interest

November 27, 2016

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

Subject: Comments on DEIS, EA-18G Growler Airfield Operations,
 Naval Air Station Whidbey Island

To Whom It May Concern:

This letter provides my comments on the draft environmental impact statement (DEIS) dated November 2016 for EA-18G Growler operations at Naval Air Station Whidbey Island Complex. In general, I'm very concerned with the limited scope of the DEIS including the lack of evaluation for the Navy's changeover from the Prowler fleet to the current Growler fleet and subsequent impacts to the San Juan Islands and the evaluation of noise by modeling methods without proper calibration using actual monitoring in locations within the San Juan Islands. The DEIS ignores the impacts to the San Juan Islands which has observed the most impacts to our way of life since the introduction of the Growler aircraft. My specific comments are provided below.

First of all, the DEIS is flawed from the start because it doesn't evaluate the effects to surrounding communities, including Lopez Island, from when the Growler fleet replaced the previous Prowler fleet at the base. The DEIS should have evaluated environmental and health effects to those in the surrounding area (including San Juan Islands) related to these changes by NAS Whidbey. In particular, the noise differences between the proposed Growler and Prowler aircraft. In the previous Wyle Aircraft Noise Study (dated October 2012), it was acknowledged that the Growler produces more low-frequency noise, on average 11 decibels, than the Prowler aircraft previously used by the Navy. This increased low-frequency noise has a greater impact on areas further from the base (i.e., San Juan Islands) because it travels further than high-frequency noise. Those of us who live in the San Juan Islands have noticed a significant increase in noise to our area from the Growler aircraft including vibration and rattling of our homes, resulting in disruptions to our way of life. This has been notably amplified when the Navy suspends use of the OLF Coupeville airfield, and increases operations at the Ault field. The fact that the Navy doesn't further evaluate the noise level impacts of the Growlers compared with the Prowlers is flawed and should be addressed in the DEIS. This would fall under the alternative: *"Moving the Growler Community Elsewhere."*

Comments of DEIS

Page 2 of 3

Flight patterns used in the DEIS don't include those over Lopez Island. Since Growlers have become the primary aircraft used at Whidbey, they periodically (at least weekly) fly over northern Lopez Island through Deception Pass at low altitude and slow speeds, usually with gear down. The noise level from these jets is deafening! I've complained through the Navy complaint line and documented these occurrences on the San Juan County website but if anything the number of flights over our area has increased, and will increase further with each of the proposed alternatives. The flight path wasn't even acknowledged in the DEIS as a routine corridor; however, the number of flights is consistent with little difference from week to week. There is no explanation in the DEIS for these low altitude flight paths over Lopez Island except for it may be considered below the 65 dB noise level (average) and therefore not considered significant to the Navy in the DEIS.

The use of a 65 dB day-night average sound level (DNL) contour as the lower limit of sound impacts in the DEIS is also flawed. The reference used in the DEIS to warrant this limit, Federal Interagency Committee on Urban Noise (1980), bases its conclusion on urban noise levels, not rural levels found in the San Juan Islands. The sound impacts to rural areas like Lopez island should be addressed for each alternative, including the changes in sound levels we have experienced since the Navy introduced the Growlers to our area over the last several years. The Navy's analysis ignores these impacts because the noise evaluation is based on modeling only.

The use of NOISEMAP to model noise impacts in the San Juan Islands is flawed and doesn't represent the actual noise impacts we have experienced since the Growlers were introduced by the Navy or any of the current alternatives evaluated in the DEIS. Without actual noise monitoring, there is no localized calibration of the model used in the DEIS and therefore, the results are not representative of actual noise levels experienced by area residents. The Navy must collect real-time noise data to confirm the model results and potential impacts of noise to humans and animals within the San Juan Islands.

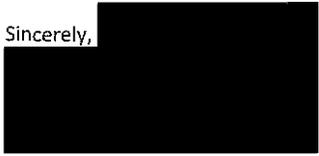
One of the points-of-interest (parks) which should be included in the noise evaluation is Spencer Spit State Park on Lopez Island. Growler aircraft frequently fly over or near this park, along an undocumented flight path through Thatcher's Pass and on to NAS Whidbey. This location would also be a good location to monitor noise levels, in addition to the Lopez School and a representative location on the sound end of Lopez Island.

With more noise from these aircraft, our local economy has been affected due to a decrease in tourism to the area. Our home values have also declined with realtors required to acknowledge the impacts of Growler aircraft noise for any potential sale. NAS Whidbey's intrusive noise and low altitude, over-flights are incompatible with local land use in our rural region. The DEIS should include the impacts to the San Juan County economy.

The addition of EA-18G Growler aircraft to NAS Whidbey has been a "game changer" for those of us living in the San Juan Islands. We bought our property years ago with full knowledge and support of NAS Whidbey operations. However, the Navy recently changed aircraft operations with the addition of the Growler aircraft (94 strong with the possibility of 36 more), resulting in a significant impact to our way of life here on the islands.

These impacts must be further evaluated and remedied by the Navy.

Sincerely,

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

Comments on Draft Environmental Impact Statement, EA-18G Growler Airfield
Operations, Naval Air Station Whidbey Island

[REDACTED], Lopez Island Resident [REDACTED]
[REDACTED]

Lopez Island, WA 98267

In general, I'm very concerned with the limited scope of the DEIS including the lack of evaluation for the Navy's changeover from the Prowler fleet to the current Growler fleet and subsequent impacts to the San Juan Islands, and the evaluation of noise by modeling methods without proper calibration using actual monitoring in locations within the San Juan Islands. The DEIS ignores the impacts to the San Juan Islands which has observed the most impacts to our way of life since the introduction of the Growler aircraft.

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- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.k. Comparison of the Prowler to the Growler
- 4.l. Points of Interest

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The addition of EA-18G Growler aircraft to NAS Whidbey has been a "game changer" for those of us living in the San Juan Islands. We bought our property years ago with full knowledge and support of NAS Whidbey operations. However, the Navy recently changed aircraft operations with the addition of the Growler aircraft (94 strong with the possibility of 36 more), resulting in a significant impact to our way of life here on the islands. These impacts must be further evaluated and remedied by the Navy.

Coupeville, WA 98239

I would like to comment on the EIS regarding EA-18G Growler aircraft use of OLF Coupeville. I have lived in Coupeville for 25 years, and for the last 3 years have lived at the highest point in town – on Summit Loop on Pennington Hill. We moved here from Madrona Way on the western side of Coupeville, but still in the town limits. While we could hear noise from jets using the OLF field from our Madrona Way house, the noise is quite a bit louder at our new house on the eastern side of town. There are times when we can't hear each other speak, and can't hear the TV, while sitting in our living room. It is especially disruptive when the jets fly in the evening, especially after normal bed times. I would encourage the EIS reviewers to severely limit or eliminate entirely the use of OLF for EA-18G Growler practice. My issues are: • Loud noise that disrupts my living, even inside my house • Loud noise late at night, that disrupts my sleep, and thus my health • Loud noise that is potentially harmful to our hearing and general health • Loud noise that is potentially harmful to the hearing and healthy development of my two grand-daughters (age 9 and 1) that live in Admirals Cove and are even closer to the sound • Loud noise that is potentially harmful to the hearing and healthy development of children attending Coupeville Schools • In addition to the noise issues, a higher potential for increased contamination of ground water in the single-source wells in the area around OLF Coupeville. If the use of OLF Coupeville cannot be severely limited or eliminated entirely, I would encourage the EIS reviewers to consider Scenario C (20% OLF use) as the least objectionable alternative.

1.a. Thank You

11.a. Groundwater

2.m. Record of Decision/Preferred Alternative

4.m. Supplemental Metrics

4.r. Nonauditory Health Effects

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
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
- 2.m. Record of Decision/Preferred Alternative
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

23 (The personal identifiable information disclosure
24 statement was read to the following commenter.)
25 [REDACTED] Okay. Mary read me the

1 statement for the comments and stuff, the confidentiality
2 requirements, and so she's read that to me.

3 My name is [REDACTED]. I've got to
4 give -- I live at [REDACTED] Oak Harbor,
5 Washington, 98277. My phone number is area code [REDACTED]
6 [REDACTED]. Now we can proceed. I've done what I have to do
7 there. Right? Okay.

8 Now, okay, for where I live, I live right on the
9 end of the runway, and it is very difficult to hear during
10 the day or night. You can't talk on the phone when the
11 planes are flying. Nobody can hear you and you can't hear
12 them. The television is up full blast and then down when
13 they're not overhead. So the noise is very hard. And some
14 days, you know, they fly sometimes all night, you know,
15 different times, not every night, but occasionally they do,
16 so that kind of keeps you awake.

17 The house shakes like an earthquake or just bumps
18 a little bit like a small earthquake. The doors and stuff
19 in the house don't shut anymore, you know. Some of them
20 don't close completely, and so that's not really too safe.
21 You know, you can't always lock the doors and stuff in the
22 building.

23 And let's see. What else? Oh, there's so many
24 things. You can feel the vapors. On a nice, sunny day you
25 think it's starting to rain where there's a mist and it's

1 the vapors from their afterburners when they land. So
2 there's a lot of things that I think for what they want to
3 do it would be better for them to fly out of Coupeville.

4 What else? I don't know. Is that about it? I
5 mean, those are my complaints. It's strictly noise. The
6 noise is just deafening. And then the stuff, I mean, you
7 can smell gasoline, you know, you can smell it when they're
8 going through because they're close enough to our house that
9 you get that. Now they're testing the waters because of
10 chemicals that are being used there at the base and we're
11 close enough that we're in that area. So it's also kind of,
12 you know, for our health -- I don't feel good anymore. I'm
13 older. I don't expect to feel as good as I did, but I don't
14 expect to feel like I'm sleeping half the time.

15 And, you know, one of my enjoyments is watching
16 T.V., and at nighttime it's almost impossible, from 8:00
17 until 12:00, 1:00 in the morning, to watch T.V., and
18 sometimes during the day and sometimes in the middle of the
19 night. But the house shaking apart is rather scary. So
20 that's about it.

21 * * *

22 (Further comment by [REDACTED].)

23 [REDACTED] Well, the windows shake
24 quite bad. I take little toothpicks and stick them in
25 between the wood and the pane to keep it from, you know,

1 cracking or so it doesn't rattle all night. And so that's
2 another thing that is, you know, kind of irritating. I've
3 got all the windows toothpicked up now, if you want to call
4 it that. So that's another thing. I'll think of more
5 later, but that's about the truth. And it does -- the house
6 is just shaking apart. I wake up sometimes and think oh,
7 there's an earthquake. And I've been through some big ones.
8 You know, like six-pointers and stuff. And I'm like this
9 and I think -- and I listen the next day and there's no --
10 you know, there wasn't an earthquake. But I can -- when I'm
11 walking across the yard, if I'm standing out in the yard
12 doing something with the trees, pruning the trees, I can
13 feel the ground under my feet. Did I put that in?

14 Okay. Good to know. But that's -- so -- okay.
15 That's some of the comments. I just hope they go to
16 Coupeville. If you live in Coupeville I'm sorry, but I hope
17 you get your just dues. People just -- I mean, we've been
18 there since '58 when they bought us out, you know, and it
19 was so pretty then. Twenty acres overlooking the Sound;
20 ride my horse down to the beach and up and down, or walk
21 down there and go swimming and sunbathing and stuff, and it
22 was a beautiful view. And the planes still flew. Those
23 were the planes that I liked, the big transporters. They
24 don't make too much noise, you know. We thought they did at
25 that time. We had no idea.

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 N/A
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

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:



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 _____

3. Address [REDACTED] Dak Harbor

4. E-mail h#

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 this project
1 scenario - because of flight
patterns

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
- 3.i. Runway Operating Hours and Flight Schedules

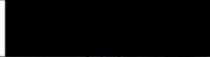
Draft Environmental Impact Statement for EA-18G "Growler" Airfield
Operations at Naval Air Station Whidbey Island Complex

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
- 4.b. NOISEMAP Model, Modeling Methodology, and
- 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,
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects

1. First Name 

2. Last Name 

3. Organization/Affiliation Citizen

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

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

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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.

Oak Harbor, WA 98277

Please remove all Growler aircraft from NAS Whidbey Island. The recent findings by the Washington State Board of Health, and the recent appellate court decision regarding reasonable notice for potential home buyers are evidence that a densely populated area is not suitable for an airfield. Shame on the county commissioners who tried to quiet Dr. Brad Thomas in favor of the Navy. Dr. Thomas said he was ordered not to say anything "anti-Navy." Really, the Navy is willing to knowingly harm its' own citizens? Of course they are. This matches the discounting manner in which citizens have been treated by the Navy. An EIS should have been ordered years ago, not just an ES passed through by [REDACTED]. His wife gets to sell more houses that way, right? I am glad that the county health board was exposed for trying to discount the health affects of the jet noise. My property lies about 5 miles east of Ault Field. I cannot be outside when the jets are screaming over my home. When the jets are doing engine run ups, or are sitting on the runway the low growling sound and the vibration overwhelm my body and senses. The glass in my china cabinet rattle and I can feel vibration on the sheetrock of my walls. People may snap and do something bad as a result of the assault on their senses. What does the Navy say to that? It is lousy to know that the Navy is willing to cause its' own workers and the community to suffer. The results of the Washington States' Board of Health should open up much more testing including North Whidbey. Please take the Growlers to Fallon, Nevada or someplace that is not so densely populated. Shame on the Navy for having your representatives laugh at us. Take all of the Growlers out of NAS Whidbey Island.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

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

4.r. Nonauditory Health Effects

Kingston, WA 98346

Unless you want to kiss goodbye to the Olympic National Forest/Park as a recreational opportunity and wildlife preserve, please immediately halt plans to use it as a site for military games or other operations. It is clear to me as a resident of Washington that this is a very BAD idea. Please call a halt to it immediately.

- 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

1.a. Thank You

LaConner, WA 98257

I can think of no rational argument for limiting the expansion of EA-18 operations at NAS Whidbey and OLF Coupeville. The air station and OLF are well situated for the training mission and provide a location for a minimum impact on both citizens and the environment. I live close enough to be impacted by the additional activity and will welcome the changes.

1.a. Thank You

Victoria, British Columbia V8N 2G4

Hello, I am writing to give my comments on the noise from the Growler operations after reading in the newspaper that some residents of Victoria's Oak Bay neighborhood have concerns. I live in the Gordon Head neighborhood of Victoria and regularly walk my dog at Glencoe Cove and Arbutus cove which look out on San Juan Island. I routinely hear the rumbling sound when the Growler operations are occurring. I don't find the sound bothersome and it does not interfere at all with my activities. [REDACTED]

Coupeville, WA 98239

I have been a resident of Whidbey Island and Ebey's Landing National Historical Reserve (ELNHR) for 13 years. Our move to this special place has been better for us than I could have ever imagined before we made the move. The beauty and natural attributes of this area are very great. I feel so fortunate to have the privilege of living in this special place. However, the enjoyment of the natural attributes of this area is potentially going to be reduced a lot if there is a huge increase in jet noise from Coupeville OLF. I am certainly a supporter of the presence of the Naval Air Base on Whidbey Island and the use of the Outlying Field (OLF) for practice in landing on Aircraft Carriers. But the noise resulting from this practice does reduce the amount of pleasure I derive from living here. This noise also has to reduce the pleasure of tourists visiting this special place. We live about 1 mile from the northern turn of the left circle of the practice run path. We clearly hear the roar of the afterburner power thrust after the planes have made their touch-down on the OLF and this thrust continues for most of the circle to return for a touch down of the succeeding practice run. When there are 4 planes circling at a time, this means that we get the loud noise every 30 seconds or so. This certainly reduces our ability to enjoy the scenery and serenity of our location when practice runs are being made. ELNHR has 1 million visitors per year. Visitors come to enjoy the scenery, but also the tranquility of this area. Indeed, a recent article in the Seattle Times called ELNHR 'soul-nourishing' because of its peacefulness and beauty (www.seattletimes.com/life/travel; posted 2/23/2017). Instead of viewing this rare rural landscape and thinking that there are only a few residents who will be affected if the duration of Growler noise is greatly increased, can we choose to value that this is a quiet place and protect this area as a refuge for visitors from noisy urban environments as well as us dispersed residents? My family has contributed thousands of dollars for the preservation of natural environments on Central Whidbey Island and we will continue to do so. We make these donations because we value this very special place for our enjoyment but also for the enjoyment of the million people who come to this place of refuge each year. We need the OLF for the practice of these pilots, no question about that. But the proposed increase in the number of these practice landings will reduce our enjoyment of the area as well as all other residents and visitors of our area. I am pleased the Naval Air Station is located on Whidbey and uses the OLF for practice landings. But I cannot support the proposed huge increase in the number of practice landings at OLF. There must be another option for some of these additional practice runs that does not put as much of a burden on us and all the visitors to ELNHR and central Whidbey Island. We want to be good neighbors to NASWI but we would also like NASWI to be good neighbors to us and not subject us to such an increase in noise production.

- 1.a. Thank You
- 12.h. Tourism
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 3.d. Arrivals and Departures

Portland, ME 04101

I lived in Port Townsend for five years and it would certainly impact the area to have air traffic overhead. Tourism is a huge part of the PT culture, not to mention the revenue. It also greatly effects the wildlife and environment. Please don't allow the planes to come into this scenic area.

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

Coupeville, WA 98239

I am concerned about the effect of the proposed expansion of the use of the NAS Whidbey Island Outlying Field on the town of Coupeville and the surrounding areas. If use of the Outlying Field is expanded, an Accident Potential Zone would be required to be established around the Outlying Field. I have been a member of the Island County Planning Commission for 12 years. During my service on the Planning Commission, Island County expanded the APZ around NASWI Ault Field. Thus, I am well aware of the pain that people feel when their property is downzoned and restrictions are put on their use of the property they own. However, that APZ zone did not include a significant portion of already developed land within the city of Oak Harbor nor any rural areas with housing developments. The Draft EIS does not include details regarding where the APZ would be established around the NASWI Outlying Field. The current flight pattern for touch and go landings involves flying very near to the town of Coupeville, including the hospital and the Elementary, Middle School and High School buildings. The town tolerates the current amount of jet noise, although there is some opposition. But if the Navy's preferred scenario (Scenario A) is chosen, the six-fold increase in FLCP will create a very significant hardship for the 1,800 residents of Coupeville and the people who live in the area around Coupeville because of the significant restrictions that will be put on use of their property. The economic driver for Coupeville and Ebey's Landing National Historical Reserve is tourism. Tourism is incompatible with a large increase in the amount of time that significant noise occurs; tourists will find another place to visit. A second important economic factor is agriculture in the area surrounding Coupeville. The farms are small and frequently use farm labor to plant, hoe and harvest crops. Thus farm workers are exposed to ambient noise levels for many hours each day. When the Growlers are flying in a touch and go pattern, the noise may be so loud that field work has to be suspended. For these reasons, I urge the Navy to explore other alternatives to Scenario A, which would increase Field Carrier Landing Practice operations from the current 6,100 to 35,100 per year. [This is an average of 85 FCLP/day; 135/day if FCLP operations only occur on weekdays.] Scenario B, which divides the FCLP evenly between Ault Field and the Coupeville Outlying Field would be more tolerable, but would still be a very large increase in the noise level within Central Whidbey, which has been set aside as a National Historical Reserve because of its rural character. In summary, increases in Coupeville Outlying Field operations will significantly harm our property values, health, education of our children and the quality of life as well as significantly impact our primary industries of tourism and agriculture. This is a burden that the Coupeville and Central Whidbey Island community cannot manage.

- 1.a. Thank You
- 1.d. General Project Concerns
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 5.a. Accident Potential Zones

February 20, 2017

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

To Whom It May Concern:

I am concerned about the effect of the proposed expansion of the use of the NAS Whidbey Island Outlying Field on the town of Coupeville and the surrounding areas.

If use of the Outlying Field is expanded, an Accident Potential Zone would be required to be established around the Outlying Field. I have been a member of the Island County Planning Commission for 12 years. During my service on the Planning Commission, Island County expanded the APZ around NASWI Ault Field. Thus, I am well aware of the pain that people feel when their property is downzoned and restrictions are put on their use of the property they own. However, that APZ zone did not include a significant portion of already developed land within the city of Oak Harbor nor any rural areas with housing developments.

The Draft EIS does not include details regarding where the APZ would be established around the NASWI Outlying Field. The current flight pattern for touch and go landings involves flying very near to the town of Coupeville, including the hospital and the Elementary, Middle School and High School buildings. The town tolerates the current amount of jet noise, although there is some opposition. But if the Navy's preferred scenario (Scenario A) is chosen, the six-fold increase in FLCP will create a very significant hardship for the 1,800 residents of Coupeville and the people who live in the area around Coupeville because of the significant restrictions that will be put on use of their property.

The economic driver for Coupeville and Ebey's Landing National Historical Reserve is tourism. Tourism is incompatible with a large increase in the amount of time that significant noise occurs; tourists will find another place to visit.

A second important economic factor is agriculture in the area surrounding Coupeville. The farms are small and frequently use farm labor to plant, hoe and harvest crops. Thus farm workers are exposed to ambient noise levels for many hours each day. When the Growlers are flying in a touch and go pattern, the noise may be so loud that field work has to be suspended.

For these reasons, I urge the Navy to explore other alternatives to Scenario A, which would increase Field Carrier Landing Practice operations from the current 6,100 to 35,100 per year. [This is an average of 85 FCLP/day; 135/day if FCLP operations only occur on weekdays.]

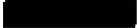
1.a. Thank You
1.d. General Project Concerns
12.e. Agriculture Analysis
12.h. Tourism
2.b. Scope of the Environmental Impact Statement and Analysis Conducted
2.k. Range of Alternatives
2.m. Record of Decision/Preferred Alternative
5.a. Accident Potential Zones

Scenario B, which divides the FCLP evenly between Ault Field and the Coupeville Outlying Field would be more tolerable, but would still be a very large increase in the noise level within Central Whidbey, which has been set aside as a National Historical Reserve because of its rural character.

In summary, increases in Coupeville Outlying Field operations will significantly harm our property values, health, education of our children and the quality of life as well as significantly impact our primary industries of tourism and agriculture. This is a burden that the Coupeville and Central Whidbey Island community cannot manage.



Coupeville, WA 98239



Olympia, WA 98502

The Olympic Peninsula is home to the only rain forest in the Northern Hemisphere. This is one of few remaining forested coastlines. Surely the Navy can exercise elsewhere. It is the duty of our military to protect our earth as well as to protect our nation. Do Not allow Growler war games on or over the Olympic Peninsula.

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.n. Alternatives Considered But Eliminated
- 7.d. Recreation and Wilderness Analysis and Study Area

Coupeville, Wa, WA 98239

As a concerned citizen of Whidbey Island, I would like to comment on the Navy's proposal to increase the number of Growler aircraft at OLF Coupeville, WA. First I would like to express our extreme gratitude to the very brave men and women who are so committed to the defense our country. Their bravery and dedication is beyond measure, and we wish them the very best in their Navy careers. I attended the open house in Coupeville on Dec. 9, 2016 and received the Guide to the Public Meeting. I also reviewed the DEIS. I feel both of these documents do not state the true consequences of the addition of 35 - 36 Growler aircraft to Whidbey, especially to the residents near the OLF. Much of the information in the guide and DEIS is rather dubious and disingenuous. The photo on page 11 of the guide shows a rather bucolic area around OLF, while in fact there are over 1000 properties, homes, outbuildings, parks, swimming pools, major state highway, dog park, a premier public salmon fishing beach, campgrounds, schools, hospitals and clinics, and agricultural areas with field workers. The noise study conducted by the Navy is not based on reality. It uses DNL which averages the noise level in an entire year, rather than the actual noise exposure per event. We don't hear 118 + dB averaged over an entire year, but in real time. The purpose of this method seems to be to diminish the actual impact of the noise, to the point where the Navy repeatedly states it shows no significant impact in both the guide and the DEIS. If you plunge your hand into boiling water for a few seconds, you will get burned. If you average the severity of the burn over one year, it doesn't seem so bad. Ridiculous. Our property is directly under the flight path (#32) on Fort Casey Road. All scenarios would increase the number of operations directly over our house from the current 6,100 to 33,500 - 35,100. According to the diagram on page 10 of the guide, the altitude of the jets above our property is about 600 ft.AGL. The decibel level during each loop is 118 or higher, which according to the chart on page 15, is in the uncomfortable range. I would describe it as intolerable. One must seek shelter immediately. Frequently, there are up to four jets in each loop, which results in a jet passing over head about every 30 seconds for hours at a time. With the increase in operations at OLF, this would result in an intolerable duration of extremely high decibel noise, from several hours per day to all day and into the night, year round. Another major concern with both the Guide and the DEIS is that neither addresses the issue of well water contamination at Ault Field and OLF with toxic chemicals used in accident responses. The guide and DEIS state that "there would be no direct impact on water quality" . This is totally false, and the DEIS should be corrected to show this. The Navy was aware of this chemical contamination before the release of the DEIS, and should have corrected it. As of Dec. 23, 2016, 6 wells near OLF show levels of contamination that exceed the EPA lifetime health advisory levels. According to a news release by COER, Dec. 8, 2016 "the fire trucks sitting at the OLF during Growler operations still have PFOA containing AFFF ready for use." According to the COER document, "Outling Field Coupeville: Its time has passed", Oct. 2016, the Growler is more prone to accidents than the preceding Prowler, and inevitably will require the use of accident response chemicals at OLF. The Navy has not provided any information regarding any new chemicals to be used, and their toxicity. Because of the new situation regarding well water contamination, the time period for comments should be extended. Many residents who do not live in the area directly affected are unaware of this problem

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.l. Points of Interest
- 7.a. Regional Land Use and Community Character

and the health risks it poses. Our pilots deserve the best training possible, at a facility that more clearly responds to the demands of the 21st century military complex, away from a civilian population forced to endure the negative impacts of extreme noise on health and well being, safety concerns of an inadequate runway length and surrounding crash zone areas, lowered property values, and contaminated well water. The many issues with OLF indicate that it is an outdated facility. The Navy should be looking for a more suitable location to provide up to date training facilities elsewhere, at a location that will ensure the best training possible for our Navy pilots well into the future. Thank you for your consideration in resolving these serious issues with the concerned citizens living near OLF Coupeville. [REDACTED] Coupeville, WA 98239

Coupeville, WA 98239

I have reviewed the Navy's EIS for EA-18G Growler Airfield Operations at NAS Whidbey Island Complex, and attended several public meetings pertaining to the same. I am a resident of the Town of Coupeville. The historic town of Coupeville is the second oldest town in the state of Washington. It is also home to Ebey's Landing Reserve, the first National Historic Reserve in the country. It is a tourist destination and people aren't coming here to listen to Growler's flying over-head hour after hour. I am not opposed to the Navy. I appreciate our military personnel. I also appreciate the rights of all citizens in the United States to speak and debate issues and protect their homes. I do not believe the Navy's EIS fairly depicted the impact of bringing more F/A-18 and EA-18G squadrons to NAS Whidbey and I oppose the Navy's proposal to increase the number of "touch and go" operations at the OLF from approximately 6,000 per year to possibly 35,000+ per year for the following reasons: 1. Noise Level Impacts: I believe the noise level study results (averaged over 365 days) as outlined in the EIS is written to give people the impression that the Growler noise impacts are far less than what we actually experience. It's the Navy's attempt at smoke and mirrors and lacks integrity. The noise level of a Growler flying over one's home is far higher and more disturbing than the "average 65 decibels" the Navy points to in its study. I request that the Navy provide honest studies regarding the following: the actual noise levels we would experience; the impact of those noise levels on school children in a learning environment; the impact of the noise levels on our hearing; the impact of this type of noise level on our sleep patterns; the overall impact of disturbed sleep patterns on our health and well-being; the impact of disturbed sleep patterns on our ability to function. 2. Number of flights: The proposed increase in flights at OLF (from approximately 6,000/year to possibly 35,000+ per year) is unacceptable. The noise from increased Growler flights over the Town of Coupeville and Ebey's Landing Reserve would destroy property values, destroy quality of life, ruin tourism in the area, have a negative financial impact in our area, and destroy the tranquility for which this part of the island is known. 3. Safety: The EIS barely touched upon the actual safety issues pertaining to the Growlers. In the " last several years the F/A-18 and EA-18G fleets have experienced a spike in problems with their cabin life-support systems—particularly the On-Board Oxygen Generation System (OBOGS). Indeed, the F/A-18 fleet experienced 297 "physiological events" from May 2010 through October 2015, according to Navy documents." The Secretary of the Navy has been ordered by Congress "to establish an independent team to review the Navy's data on, and mitigation efforts related to, the increase in F/A-18 physiological events. The Navy will be required to submit a report to the Congress on the issue by December 1, 2017." Two Growler crew members were recently VERY seriously injured at Ault Field due to this problem. What happens when these Growlers malfunction while flying over private homes in our area? 4. What sense does it make to congregate such a large portion of F/A-18 and EA-18G squadrons in one place? Seriously, it's like offering a giant bulls-eye on which enemies of the U.S. can zero in. 5. Other environmental impacts: The Navy is currently conducting studies on levels of PFOS and PFAS's in wells near OLF. The last I read, 8 wells are above lifetime EPA advisory levels near OLF. The thought is the wells were most likely contaminated by fire suppressant chemicals used at OLF. Increases in flight activity and the potential increased usage of fire suppressant chemicals could have

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.j. Property Values
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.a. Regional Land Use and Community Character
- 8.e. Outlying Landing Field Coupeville and Coupeville History

a large impact on our quality of water. . These are but a few of the reasons I believe the EIS should be re-done and why I am strongly opposed to the Navy's proposed increase of Growler flights at the OLF. Thank you.

1.a. Thank You

[REDACTED]
[REDACTED]
Marysville, WA. 98270
Phone: [REDACTED]
Date: November 19, 2016

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

Dear EA-18G Project Management:

I have received a notice from your office last week to request my opinion on the issue of EA-18G operations at the NAS Whidbey Island Complex.

I would like to express my gratitude in receiving your Naval Environmental Impact Statement. This is the first experience in getting something official from the Navy and it makes me proud. Our family lives in Marysville, WA and comes from a long lineage of aviation experience. Although we are not active or retired military, our family likes to attend military air shows and aviation events. We enjoy flying small airplanes, working on them and being exposed to all activities that are aviation related. Working as engineers for Hughes Aircraft and Boeing for 31 years and my wife working for NAVSEA and Boeing for 25 years has rounded out our love of aviation. Our children work at NAVSEA and Boeing.

We understand the environmental concerns of the additional EA-18G operations at the Whidbey NAS and Ault Field complexes. We do not feel that these operations pose undue hazards to citizens on the ground or in the air. Our military must have the freedom to train their pilots in all conditions and the sound of those EA-18G's bring tears to my eyes. Keep up the great work. Tell all the Naval personnel and aviators that we are proud of the great job they do everyday. They are the best.

Sincerely, [REDACTED]

[REDACTED]

1.a. Thank You

[REDACTED]
Marysville, WA. 98270
[REDACTED]

Date: November 19, 2016

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

Dear EA-18G Project Management:

I have received a notice from your office last week to request my opinion on the issue of EA-18G operations at the NAS Whidbey Island Complex.

I would like to express my gratitude in receiving your Naval Environmental Impact Statement. This is the first experience in getting something official from the Navy and it makes me proud. Our family lives in Marysville, WA and comes from a long lineage of aviation experience. Although we are not active or retired military, our family likes to attend military air shows and aviation events. We enjoy flying small airplanes, working on them and being exposed to all activities that are aviation related. Working as engineers for Hughes Aircraft and Boeing for 31 years and my wife working for NAVSEA and Boeing for 25 years has rounded out our love of aviation. Our children work at NAVSEA and Boeing.

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Sincerely,
[REDACTED]

Lopez Island, WA 98261

As a concerned resident of Lopez Island Washington, small business owner dependent on tourism, and father of two children. I am keenly aware of the negative impacts the Growler flight testing has on my business and my children. With the plans for adding new jets to the base I am concerned these impacts will only intensify and lead to a loss of income and more sleepless nights as my children are woken up by the house shaking as the jets blast our island with their noise. The DEIS in its current form is deficient to the point of insulting. I ask that you address the following 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. 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

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.c. Socioeconomic 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
- 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.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

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."

**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
- 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

1. First Name [REDACTED] _____

2. Last Name [REDACTED] _____

3. Organization/Affiliation _____

4. City, State, ZIP Anacortes, WA 98221 _____

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

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

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 Guemes Island and often times feel like the planes are going to land in my field. They look that close and the sound is deafening. Not good neighbor behavior.



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~~ ^{EXTENDED ONE MONTH}, 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] 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

I arrived at Coupeville on Whidbey Island in April of 1978 and have lived at the west end of Penn Cove for years. My home is 10 miles from Ault Field and 4 miles from OLF Coupeville. Navy jets pass directly over my home (sometimes two or three abreast) at an altitude of about 1000 to 1200 feet on their way to and from both Ault field and OLF Coupeville, so I'm all too familiar with the noise produced by both the EA-6B Prowler and EA-18G Growler (see "Interfacility Flight Tracks" map). When Growlers take off from Ault Field toward the northwest, with afterburners blasting, at times my whole house vibrates and the noise is so loud it's unbearable to be outside. I did not experience this when the Prowlers were in use.

- The Navy provided a report to the US FWS where they stated that the EA-18G Growler emits noise less than 90 decibels at a distance of 1200 feet, the Navy's own measurements per 2008 & 2009 reports indicate emitted noise greater than 120 decibels. **That's almost twice as loud as an**

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CONT'D PAGE 2

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

PAGE 1 OF 3

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 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
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 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.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.k. Comparison of the Prowler to the Growler
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 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

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.

EA-6B Prowler according to the Navy's own measurements in a 2009 report. The Navy has understated the noise of the Growler jets by 32 decibels. If we add 32 decibels to the maximum of 86 decibels *calculated* by the US FWS, we get a more accurate estimate of 118 decibels at 2000 feet or 124 decibels at 1000. 118 decibels is four times louder than 86 decibels and 124 decibels is about 8 times louder than 86 decibels. The Navy's own data clearly states that Growlers, as they approach a *landing*, register at 114 decibels compared with 107 for the Prowlers.

- Furthermore, the Navy has not actually taken noise measurements in our communities but relied on computer modeling that averages the noise. Averages do not tell us what the loudest event is in a 24-hour period, nor how many noise events there may be in a 24-hour period. **Our ears do not average noise events or duration. Measuring the jet noise as an average appears to be an attempt to minimize, conceal or obfuscate the impact on residents.**
- Use of an A-weighted filter approximates the sound signal in different frequency areas according to the sensitivity of the hearing mechanism, **but only at low levels. For signals louder than 40 decibels, this A-weighted filter cuts off too many low frequencies incorrectly and is only really valid for relatively quiet sounds and for pure tones. EA-18G Growler engines emit noise that is anything but quiet and a pure tone. Growler engines emit a very loud mix of frequencies, rich in low frequency noise that is heard and felt over miles.**

The Navy seems to minimize the proposed huge 717% increase in frequency (total FCLPs) and nearly double (>7db) intensity of noise events with statements like **"Intermittent aircraft noise can disrupt conversations and sleep and be an annoyance."** This proposed increase in noise is far more than that. There are serious health consequences like **stress, anxiety, high blood pressure, irritability, anger, gastro-intestinal problems, chronic fatigue and Tinnitus (ringing in the ears) that were not addressed. Hearing loss and sleep disturbance were addressed based on understated noise levels.**

- 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.
- The Coupeville area is much more dependent on tourism than Oak Harbor. Economic impact on tourism, property value loss, decline in population, loss of businesses are not addressed adequately.
- Water contamination to our wells is not addressed.

CONT'D PAGE 3

For more information, please visit the project website at whidbeyeis.com

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PAGE 2 OF 3

- Impact to natural resources is not addressed: bird migration and animal habitat; impact on Ebey's Landing National Historic Preserve.
- The Coupeville area has a large number of retirees, many of which are low income and cannot afford to move if they find the increased jet noise unbearable. These people will be trapped unless the Navy pays moving costs and compensates them for property value loss.
- Commercial airports have noise abatement requirements and limits on hours of operation. The Navy appears to want no such limits. This needs to be addressed.
- When the third runway was constructed at Sea-Tac Airport, the Port Authority had to provide sound insulation (more insulation, windows, baffling for chimneys) in 9,400 homes and purchase (condemn) 1400 single family homes and 359 mobile homes which would be subjected to too much noise. Despite the Port Authority's efforts, there are still many noise complaints. Noise events in the Sea-Tac area have been measured at 89 decibels even with noise abatement procedures in effect. Commercial aircraft with fan-jet noise containment technology produce far less noise than EA-18G Growlers. In spite of these measures, the residents around Sea-Tac Airport feel duped. They were assured that the third runway would *only* be used occasionally and under certain conditions. Since construction, over 40% over the aircraft traffic has been shifted to the third runway. In comparison, by the Navy's own measurements per 2008 & 2009 reports indicate Growlers produce noise greater than 120 decibels at 1200 feet. The Navy's own data clearly states that Growlers, as they approach a *landing*, register at 114 decibels.
- The Navy's proposed 575% increase in FCLPs at the Coupeville OLF (proposed Option A) and near doubling of noise per event will, for many if not for most, destroy the quality of life we enjoy in the Coupeville area, the reason we live here.

Noise crosses all property lines. Excessive noise is a trespass. The Navy is telling us that they intend to trespass on our properties, invade our homes and rob us of something very near and dear to us, our quality of life, our peace, our serenity and quite possibly our health. How can the Navy possibly claim "It's a priority for the Navy to *promote the well being* of individuals residing in communities surrounding it's installations" unless they abandon this plan to increase total FCLPs (Ault Field & Coupeville OLF) by 717%. Websters Dictionary says to "*promote*" is "to help or encourage to exist or flourish." Websters also says to "*promote*" can mean "to obtain (something) by trickery".

- OLF Coupeville was built in 1943 when the population of the entire county was only 6,098. OLF was only lightly used for 70 years. The population of Island County is now 78,500 with 377 people per square mile versus 101 people per square mile for the entire state of Washington. **Island County's population has increased 1,287% since 1943. The Navy should be decreasing use of OLF not increasing use.** The Navy has stated that NAS Whidbey Island is the only EA-18G base in the country. Is it really wise for the Navy to put all their eggs in one basket?

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YOUR INPUT MATTERS

PAGE 3 OF 3

Langley, WA 98260

Dear Sir or Madam, It is hard to know where to begin because I have so many concerns about the dramatic increases in Growler training flights at both OLF and Ault Field. I am a resident of South Whidbey, but spend time with friends living very near OLF (on [REDACTED]) as well as at various Central and North Whidbey outdoor recreation sites. In addition to the time I currently spend in the areas that will likely be affected by the increased Growler flights, I experienced the impacts flights had on the teaching/learning environment when I worked as a science teacher at [REDACTED] High School in the 1999-2000 school year. While I cannot speak to the necessity of the increased numbers of Growlers, I do question how necessary it is to center these incredibly loud jets all in one area. They do significantly and negatively affect the people living and working in our area that I have to wonder, first and foremost, why the impact can't be spread around. There seems to be no consideration whatsoever of having some or all new Growlers located elsewhere, at a different base, so that the terrible impacts of the increased training don't fall entirely on the population of Whidbey Island and the surrounding islands. I have very carefully read the parts of the DEIS regarding noise levels and if/how/how frequently/how many people will be affected by the increased FCLPs under the various Action Alternative and Scenario combinations. It is disappointing to read it and find that you didn't make actual noise measurements. This seems critical to me, and since the potential for dramatically increased noise is a main concern for people living near both air fields, I cannot understand it. Furthermore, the averaging of noise levels over a day and a night (DNL) makes no sense to people actually experiencing the noise. I have experienced it myself hundreds of times, and averaging it with the quiet times in between fly-bys is, quite frankly, totally absurd. If you are nearby or directly under the flight path, the noise from a Growler can be absolutely horrendous. To have the noise pass over your home, farm, business, school, park.....over and over again every day would be terrible! No one would willingly and happily submit themselves to this voluntarily. In addition to these inadequacies, it also seems like you're not addressing the noise levels above 65 dB. There is much discussion in the EIS of the various noise contour levels up to the 65 dB levels that supposedly don't bother people, but, again, your DNL average doesn't come close to adequately portraying how the noise is actually experienced by people on the ground near the air fields. There will be thousands of people experiencing noise well over 65 dB many, many times a day. They won't just be bothered; it will make their lives - both living and working situations - totally unbearable. Again, relating to the noise of increased Growler FCLPs. As a teacher at [REDACTED] 17 years ago, I often had to stop teaching because of the noise. At the time, it felt like an annoyance, and an understandable one considering how near the school is to [REDACTED]. To know, however, that the number of flights and classroom disruptions (at OH schools and/or Coupeville schools) will be increasing in number by tens of thousands every year....well, it's hard to even imagine how children could learn under such conditions. Whidbey Island has many uniquely beautiful natural areas that are national treasures. When the Growlers are flying nearby and passing overhead over and over again, it's pretty much impossible to enjoy the outdoors. I've experienced this on the beach near Coupeville. I've experienced this at a friend's house on [REDACTED]. I've experienced this at Ebey's Prairie and bluff. I've experienced this at Deception Pass. I've even

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 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.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

experienced this at the Fort Casey pool. I've been with a five year old child who was absolutely terrified by the noise of the Growlers. This is a bright child who is old enough to understand, in an intellectual way, that he was in no danger, but his body was reacting physically to a very real stress – incredibly loud NOISE! – that caused his little body to have a fight-or-flight reaction. Another, related concern that I was disappointed to see inadequately addressed in the DEIS is that the people who live nearby, especially near OLF, will see their property values plummet. I see no discussion of how property owners will be compensated for the very real monetary loss they'll be experiencing. As I said earlier, anyone who could avoid it wouldn't willingly subject themselves to the noise levels that will be plaguing residents near the air fields. It's hard to imagine someone coming to the historic town of Coupeville and deciding to buy a house nearby once they've experienced even an hour's worth of FCLPs. I'm concerned that the town, a cultural treasure of our state, not just Whidbey Island, will be ruined by increased FCLPs, especially under the scenario A. I expect that the area, which counts so much on tourism, will see a dramatic drop in visitors and as a result will experience a tremendous decline as a community. Many of the businesses will not be able to make it with the drop in tourism expected. Finally, I am very, very concerned about the likelihood of increased pollution to our Whidbey Island aquifers. At the time of the EIS publication, the fire-fighting chemical PFOA had not yet been found in wells around Coupeville. This is a new issue that must be addressed. People cannot live with polluted water, and it seems clear that there is a dramatically increased risk of more PFOA and other pollutants (especially petrochemical) with the proposed increases in Growlers and Growler FCLPs. These risks seem to me to point toward using Ault Field more than OLF, since at least the people of Oak Harbor have water from the Skagit Valley instead of having to rely on groundwater like Coupeville area residents do. Thank you very much for considering my comments. Respectfully yours, [REDACTED] Langel, WA 98260

Langley, WA 98260

Dear Sir or Madam, It is hard to know where to begin because I have so many concerns about the dramatic increases in Growler training flights at both OLF and Ault Field. I am a resident of South Whidbey, but spend time with friends living very near OLF (on [REDACTED] Drive) as well as at various Central and North Whidbey outdoor recreation sites. In addition to the time I currently spend in the areas that will likely be affected by the increased Growler flights, I experienced the impacts flights had on the teaching/learning environment when I worked as a science teacher at Oak Harbor High School in the 1999-2000 school year. While I cannot speak to the necessity of the increased numbers of Growlers, I do question how necessary it is to center these incredibly loud jets all in one area. They so significantly and negatively affect the people living and working in our area that I have to wonder, first and foremost, why the impact can't be spread around. There seems to be no consideration whatsoever of having some or all new Growlers located elsewhere, at a different base, so that the terrible impacts of the increased training don't fall entirely on the population of Whidbey Island and the surrounding islands. I have very carefully read the parts of the DEIS regarding noise levels and if/how/how frequently/how many people will be affected by the increased FCLPs under the various Action Alternative and Scenario combinations. It is disappointing to read it and find that you didn't make actual noise measurements. This seems critical to me, and since the potential for dramatically increased noise is a main concern for people living near both air fields, I cannot understand it. Furthermore, the averaging of noise levels over a day and a night (DNL) makes no sense to people actually experiencing the noise. I have experienced it myself hundreds of times, and averaging it with the quiet times in between fly-bys is, quite frankly, totally absurd. If you are nearby or directly under the flight path, the noise from a Growler can be absolutely horrendous. To have the noise pass over your home, farm, business, school, park.....over and over again every day would be terrible! No one would willingly and happily submit themselves to this voluntarily. In addition to these inadequacies, it also seems like you're not addressing the noise levels above 65 dB. There is much discussion in the EIS of the various noise contour levels up to the 65 dB levels that supposedly don't bother people, but, again, your DNL average doesn't come close to adequately portraying how the noise is actually experienced by people on the ground near the air fields. There will be thousands of people experiencing noise well over 65 dB many, many times a day. They won't just be bothered; it will make their lives - both living and working situations - totally unbearable. Again, relating to the noise of increased Growler FCLPs. As a teacher at OHHS 17 years ago, I often had to stop teaching because of the noise. At the time, it felt like an annoyance, and an understandable one considering how near the school is to Ault Field. To know, however, that the number of flights and classroom disruptions (at OH schools and/or Coupeville schools) will be increasing in number by tens of thousands every year....well, it's hard to even imagine how children could learn under such conditions. Whidbey Island has many uniquely beautiful natural areas that are national treasures. When the Growlers are flying nearby and passing overhead over and over again, it's pretty much impossible to enjoy the outdoors. I've experienced this on the beach near Coupeville. I've experienced this at a friend's house on [REDACTED] Drive. I've experienced this at Ebey's Prairie and bluff. I've experienced this at Deception Pass. I've even

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 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.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

experienced this at the Fort Casey pool. I've been with a five year old child who was absolutely terrified by the noise of the Growlers. This is a bright child who is old enough to understand, in an intellectual way, that he was in no danger, but his body was reacting physically to a very real stress – incredibly loud NOISE! – that caused his little body to have a fight-or-flight reaction. Another, related concern that I was disappointed to see inadequately addressed in the DEIS is that the people who live nearby, especially near OLF, will see their property values plummet. I see no discussion of how property owners will be compensated for the very real monetary loss they'll be experiencing. As I said earlier, anyone who could avoid it wouldn't willingly subject themselves to the noise levels that will be plaguing residents near the air fields. It's hard to imagine someone coming to the historic town of Coupeville and deciding to buy a house nearby once they've experienced even an hour's worth of FCLPs. I'm concerned that the town, a cultural treasure of our state, not just Whidbey Island, will be ruined by increased FCLPs, especially under the scenario A. I expect that the area, which counts so much on tourism, will see a dramatic drop in visitors and as a result will experience a tremendous decline as a community. Many of the businesses will not be able to make it with the drop in tourism expected. Finally, I am very, very concerned about the likelihood of increased pollution to our Whidbey Island aquifers. At the time of the EIS publication, the fire-fighting chemical PFOA had not yet been found in wells around Coupeville. This is a new issue that must be addressed. People cannot live with polluted water, and it seems clear that there is a dramatically increased risk of more PFOA and other pollutants (especially petrochemical) with the proposed increases in Growlers and Growler FCLPs. These risks seem to me to point toward using Ault Field more than OLF, since at least the people of Oak Harbor have water from the Skagit Valley instead of having to rely on groundwater like Coupeville area residents do. Thank you very much for considering my comments. Respectfully yours, [REDACTED] Langel, WA 98260

Greenbank, WA 98253

1.a. Thank You

4.r. Nonauditory Health Effects

I am frightened to go to Coupeville, which is my business address, during EA-18G Growler Airfield Operations on account of the aggressive low-level maneuvers near the Outlying Field. I was startled into driving off the road when one blasted out of the trees overhead. Navy should stop using the Outlying Field for these practice runs.

1.a. Thank You

Kodiak, AK 99615

Our family has been in the San Juan's for more that 100 years We have property in Mackaye Hbr.on Lopes Island. My dad bought it nearly 47 years ago. We spend a lot of our stateside time there. I think you are doing good in your attempts to reduce " growler" noises and letting folks know when exercises are scheduled. There is too much emotion and little truth or logic involved in criticizing the Navy. Opponent's often mention "medical" danger in low frequency sound. I would ask what medical journal that is cited in? Most of the people that rant against the Navy have lived (or not) for short periods of time in the area and arrived long after the air station was built. If they have a "beef" they should take it up with the real-estate agent they bought their property from. As a 73 year old former navy Brat growing up on several stations I suffer no long term effects from jet noise. My dad was the base Senior Chief and Master Chief of the crash crew at Miramar before he retired in 59. I recall when a young Marine j.g. flew a "flame out" jet over a new subdivision and school built just south of the base. He could have bailed but instead "dead stacked" over those kids and people and died.. The subdivision folks railed against the Navy and wanted the base closed.... I stead fast support the Navy and its defense of our nation. Thanks for doing what you do! Master Chief [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 _____

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

3. Address _____ *OAK HARBOR WA 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
- 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
- 12.o. Cost-Benefit Analysis
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 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
- 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:

PROVIDE

- PEER REVIEWED COST & BENEFIT ANALYSIS
- TEST FLIGHTS PRIOR TO PROPOSE ROD'S F EIS'S
 - LET LOCAL CITIZENS EXPERIENCE IMPACTS
 - DO ACTUAL SOUND, NOISE TESTS - NOT IMPERICAL REFERENCES BASED ON 'DATA' FROM OTHER 'STUDIES'
- E.I.S. - HONEST COMPREHENSIVE

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

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.

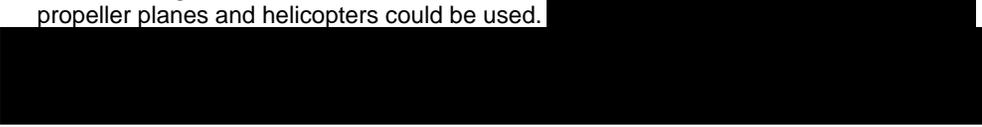
Clinton, WA 98236

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

I am deeply concerned for the health and well being of the children and residents of Coupeville. I have 3 children and could not imagine the effect of these loud noises interrupting their classes 1-6 times an hour. I have heard the growlers first hand and there is no denying that they have an effect on your system, focus, and nervous system. Environmental factors effect the development of children. If we want healthy children and a healthy society we cannot poison them with this abrupt and obtrusive noise. There is grave effect and damage to all those in the community. We cannot abuse americans in the name of safety. NO to the growlers.

Camano Island, WA 98282

The San Juan Islands are a national treasure. The Navy says it has the right to steal the quiet, pollute the air, and deny residents and visitors this beautiful, tranquil archipelago. Navy jets inundate the islands with noise. People have to cover their ears when the jets fly. Folks cannot dine outdoors or camp in the parks without having their conversations -- and sleep -- disrupted. Even inside homes people must interrupt conversations and phone calls because they cannot hear over the noise. The Navy says it fights for "freedom" but it denies U.S. citizens their freedom, their right to live their lives quietly and without pollution — free to seek "life, liberty, and pursuit of happiness" — free from the oppression of Navy jet noise and pollution. A suggestion: The jets should be moved to another base such as Moses Lake in Washington or China Lake in California where noise wouldn't be such a problem. The Whidbey base could be used for quieter and life-enhancing activities such as Search and Rescue or Coast Guard work -- and propeller planes and helicopters could be used.



1.a. Thank You

2.n. Alternatives Considered But Eliminated

4.k. Comparison of the Prowler to the Growler

4.l. Points of Interest

4.n. Speech Interference (Indoor and Outdoor)

4.p. Sleep Disturbance

6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

1.a. Thank You

2.n. Alternatives Considered But Eliminated

freeland, WA 98249

folks, we all need to share this island. any way that you measure it the growlers are loud. too loud to be flying over peoples heads and houses. find a way to send them out over the sea. build a floating landing strip. we've put men on the moon, surely a more peaceful and considerate approach for whidbey can be accomplished. thank you.

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.

20 years we have taken the noise without or with little complaint. We are not taking the changes you have in store for us without a fight! This is unacceptable from the Navy who our taxes support. This is simply inhumane + our historic town can not take it.

We won't

For more information, please visit the project website at 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

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

COUPEVILLE, WA 98239

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

COUPEVILLE, WA 98239

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.

COUPEVILLE, WA 98239

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.

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

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.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

COUPEVILLE, WA 98239

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

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

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

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

2.n. Alternatives Considered But Eliminated

What the Navy wants is simply unreasonable, unsafe, unjust and inhumane. Real community can not just pick up and move every four years at the expense and efforts of their employer. Stop being short sighted and find a deserted place to practice.

Coupeville, WA 98239

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

Unfortunately my husband and I could not make the meeting the Navy held last week in Coupeville and Oak Harbor. I feel so strongly that the contaminated well in Coupeville should be capped and a new clean well should be drilled for the residents. My water is fine but I worry any amount could over time affect the youngsters and babies seriously. We really don't understand the seriousness of it. So let's use wise judgement and get all the folks in Coupeville clean water. Doesn't everyone deserve that? And I don't believe the cost is so prohibited! Thank you! [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 [Redacted]

2. Last Name [Redacted]

3. Organization/Affiliation _____

4. City, State, ZIP [Redacted] LOPEZ ISLANDS, 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
- 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

→ ACTION ITEMS ARE IN BOLD ←

Note: For Draft EIS page citations and supporting references see 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:

Submitted on 2-23-2017

by 

QUIET SKIES

Over San Juan County

Navy DRAFT Environmental Impact Statement (EIS)

To add 36 Growlers to the 82 already based at
Naval Air Station Whidbey Island (NASWI)

Meeting with the NAVY

Lopez Center for Community and the Arts
Wednesday, December 7, 2016
Drop in: 3 - 6 pm

To view the Draft EIS:

Hard Copy at the Lopez Library
Online: <http://www.whidbeyeis.com/CurrentEISDocuments.aspx>

What is this meeting about?

At the Scoping Meeting in 2014, the Navy asked for comments on what we wanted them to consider – before adding 36 Growlers to NASWI. They have supposedly done that and the Draft EIS (1,500 pages) presents the results of what they considered and their reasons for not incorporating certain public suggestions.

The Draft EIS presents 3 Action Alternatives – all of which include adding an additional 35 or 36 Growlers to NASWI.

The meeting will be an opportunity to ask questions of the Navy personnel which may help clarify your concerns and help us create useful comments to submit.

Our job NOW is to read the Draft EIS and find:

- * Errors or new information that would change the analysis and conclusions.
- * Things that are incorrect, incomplete or need to be clarified.
- * A substantially different Alternative that meets the Navy purpose and need.

We need to comment by January 25, 2017:

This is a time to say more than "I'm opposed to adding 36 more Growlers." We have to say specifically where the Navy analysis is incorrect or incomplete. Comments need to be supported by Draft EIS page number, explanations, facts and references. **In Federal procedures only individuals who have commented can object when the Decision is made.**

Suggested comments begin on the next page. Feel free to edit or use your own words.

Page 5 is a summary of the comments. You can fill in your name and address and drop the sheet into the comment box at the December 7th meeting.

- 1.a. Thank You
- 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.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

Suggested Comments on the Navy Draft EIS

1. Not evaluating the low-frequency noise characteristics of the Growler

Section 3.2 - Noise Associated with Aircraft Operations - makes no mention of the signature low-frequency noise of the Growler. All of the noise analysis is solely based on A-weighted sound (dBA) which ignores the lower frequencies, and is therefore deficient.

Nevertheless, the Draft EIS at 4-194 states "... the 2012 study included a brief examination of low-frequency noise associated with Growler overflights at 1,000 feet AGL in takeoff, cruise, and approach configuration/power conditions ... The study found that takeoff condition ... overall C-weighted sound level of 115 dBC. The Growler would exhibit C-weighted sound levels up to 101 dBC when cruising and 109 dBC (gear down) at approach." Page 4-193 states "According to Hubbard (1982), a person inside a structure can sense noise through vibration of the primary components of a building, such as the floors, walls, and windows; by the rattling of objects; ..."

The World Health Organization "Guidelines on Community Noise" (Berglund, 1999) <http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf> states:

"When prominent low frequency components are present, noise measures based on A-weighting are inappropriate;"
 "Since A-weighting underestimates the sound pressure level of noise with low frequency components, a better assessment of health effects would be to use C-weighting"

Closing windows and doors provides limited reduction for low frequency noise entering a building as measured by sound Transmission Loss tests (see graph on <http://windowanddoor.com/article/04-april-2007/understanding-basics-sound-control>). Therefore assumptions throughout the study assuming an average noise level reduction with windows closed is optimistic.

RECOMMENDATION: Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).

2. Discounting Health Effects of Noise

The Draft EIS at 3-22 states "No studies have shown a definitive causal and significant relationship between aircraft noise and health. Inconsistent results from studies examining noise exposure and cardiovascular health have led the World Health Organization (2000) to conclude that there was only a weak association between long-term noise exposure and hypertension and cardiovascular effects."

The statement above disagrees with multiple findings in the WHO "Guidelines on Community Noise" (Berglund, 1999):

"For a good night's sleep, the equivalent sound level should not exceed 30 dB(A) for continuous background noise, and individual noise events exceeding 45 dB(A) should be avoided."
 "For noise with a large proportion of low frequency sounds a still lower guideline is recommended"
 "It should be noted that a large proportion of low frequency components in a noise may increase considerably the adverse effects on health"
 "The evidence on low frequency noise is sufficiently strong to warrant immediate concern"

Waye (2004) finds "As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings. Sleep disturbance, especially with regard to time to fall asleep and tiredness in the morning, are commonly reported in case studies on low frequency noise. However, the number of studies where sleep disturbance is investigated in relation to the low frequencies in the noise is limited. Based on findings from available epidemiological and experimental studies, the review gives indications that sleep disturbance due to low frequency noise warrants further concern." <http://www.noiseandhealth.org/text.asp?2004/6/23/87/31661>

Specific guidelines are found in the "WHO Night Noise Guidelines for Europe" (2005), Table 5.1, "Summary of effects and threshold levels for effects where sufficient evidence is available." http://www.euro.who.int/_data/assets/pdf_file/0017/43316/E92845.pdf

During Scoping 1785 comments were submitted on Noise and Vibration and 914 on Health Effects (Table 1.9-5).

The Navy has not demonstrated there are no health impacts from Growler noise.

RECOMMENDATION: Recognize the impacts of low frequency Growler noise on health.

3. Exclusion of San Juan County Noise Reports

Section 1.9.5 states "The Navy continues to evaluate noise reports that have been developed by independent sources and review their findings in conjunction with this EIS analysis." Not included in the Draft EIS is data collected by San Juan County (SJC) <http://sjcgis.org/aircraft-noise-reporting/> Data collected since May 14, 2014 has been regularly sent to NASWI.

More than 6000 citizen reports include date, time, location and noise characteristics. The Navy should correlate that data with the information they collect on flight tracks to understand what activity causes disruptive noise in SJC. Actual noise reports and measurements should be used to benchmark the computer modeled noise impacts used for evaluation and decision-making. Reports can also help to develop mitigation measures.

RECOMMENDATION: Incorporate San Juan County noise reports in the EIS analysis.

4. Exclusion of the SJI National Monument

The Draft EIS suggests that the lands and waters of the San Juan Islands National Monument are exempt from National Environmental Policy Act protection because the 2013 proclamation establishing the Monument 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 only has the effect of preserving the status quo: 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 Monument area from federal laws that already applied to wildlife there. Hence creation of the Monument did not exempt the Navy from NEPA or Endangered Species Act with respect to wildlife in the Monument, such as Marbled Murrelets or marine mammals.

At 3.5.2.4 the Draft EIS acknowledges "However, the Bureau of Land Management (BLM) has determined that BLM-owned and controlled lands in the San Juan Islands National Monument possess wilderness characteristics." It also concedes that the Monument is subjected to a maximum noise level of 95 dB (SEL) an estimated 372 times per year (at 3-34)

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

5. Exclusion of New Technology Alternatives

In 2014 the Department of Defense successfully demonstrated carrier takeoff, landing, and formation flying capabilities of the unmanned X-47B prototype that is part of the Unmanned Carrier-Launched Airborne Surveillance and Strike (UCLASS) program. <http://breakingdefense.com/2014/08/x-47b-drone-manned-f-18-take-off-land-together-in-historic-test> The UCLASS jets can meet the Purpose and Need, delivering the same capability for electronic surveillance and attack against enemy radar and communications systems as the Growlers.

This Alternative has many benefits. Because of its inherent automation UCLASS would significantly reduce the amount of land-based training that impacts our community. It eliminates the high risk to the Growler's two-person crew from advanced anti-aircraft threats. The smaller UCLASS vehicle is lighter and uses less fuel. Eliminating the \$3 billion purchase of 36 Growlers will save taxpayer money. Some experts believe we are already flying the last generation of manned military aircraft. With a focused effort the Navy could deploy the UCLASS while the existing 82 Growlers carry out the mission.

RECOMMENDATION: Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.

6. Lack of Commitment to Noise Mitigation

At 1-20 the Draft EIS discusses Noise Mitigation. The only cited measure in place is "to share flight schedules and other information and to solicit public feedback." Potential measures include construction and operation of a noise suppression facility for engine maintenance (Hush House), Engine Chevrons (noise reduction) and MAGIC CARPET (automating parts of carrier landing which will reduce FCLP training activity).

Further discussion on Existing Mitigation at 3-30 states "NAS Whidbey Island has noise-abatement procedures ... to minimize aircraft noise. Airfield procedures used to minimize/abate noise ... include optimizing of flight tracks, restricting maintenance run-up hours, runway optimization, and other procedures Additionally, aircrews are directed, to the maximum extent practicable, to employ prudent airmanship techniques to reduce aircraft noise impacts and to avoid sensitive areas except when operational safety dictates otherwise."

Each Alternative is an irrevocable decision to add 35 or 36 Growlers at NASWI. Therefore the Navy should commit to Mitigation measures as part of the Final EIS and Record of Decision. Since experts have identified the need for additional research on health effects of low frequency noise the Navy should sponsor this research.

RECOMMENDATION: Commit to Mitigation Measures with timelines in the Record of Decision.

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 LONG TIME RESIDENT
- 3. Address [Redacted] WARE IS, 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

Comments

Note: For Draft EIS page citations and supporting references see 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:

I agree with all of the above

(Continue on the back)

[Redacted] 12-7-16

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

he 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.

Greenbank, WA 98253

INCREASING NUMBER OF GROWLERS: ALL IN ONE SITE, IN VULNERABLE PUGET SOUND WITH NUCLEAR BANGOR NEAR IS A SAFETY & SECURITY RISK. NOISE ABATEMENT & MITIGATION MUST BE ASSURED.

- 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
- 4.t. Noise Mitigation

Seattle , WA 98115

I strongly oppose the use of the Olympic Peninsula, particularly areas around the National Park and around Indian reservations, for military exercises. I travel frequently to the Olympic Peninsula to relax and leave behind most people. I am concerned about the impact on animals, plants, native populations, hikers, and other people who are recreating or living in the area.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area

9.a. Consideration of Tribes

1.a. Thank You

GREENBANK, WA 98253

I want to register my strong support for Navy flight operations at OLF Coupeville. The small number of activists who oppose training exercises at OLF do not represent the overwhelming majority of Whidbey Island residents. The activists' unproven claims of health risks for residents living near the OLF are simply greedy demands to satisfy their false sense of entitlement. On behalf of thousands of sensible, patriotic Whidbey Islanders, it is hoped that OLF flight operations will continue unabated.

1.a. Thank You

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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) _____

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
- 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

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

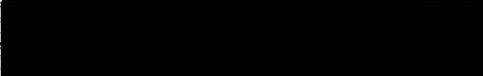
Comments must be postmarked or submitted online by February 24, 2017

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 and citizen

3. Address  *Coupeville, WA 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.

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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.
- 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:

As a mother of 4 children, residing near the Coupeville OLF airfield, I am very concerned about the impact the proposed increase in Growlers will have on my children's well-being. We had my daughter in T-ball at Rhododendron Park last spring and had to leave during practice because my daughter was in tears over the loudness and proximity of the growlers doing their practice. I am concerned about ~~the~~ my children's hearing being damaged while they're playing outside, which in and of itself, would become much more limited if the number of flights were increased at Coupeville OLF. Our animals can't bear the sound of the jets and would have to be indoors most of the time, which isn't ~~possible~~ appropriate for their health and well-being. I'm also very concerned about the impact the Growlers will have on the tourism and agricultural practices that are so vital to the life and well-being of Central Whidbey.

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

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

I am very concerned about the impact the proposed increase in Growlers would have on my family of six (including four children aged 10, 4, 3, and 0) as well as the people of Central Whidbey. My children have already been negatively impacted by the current flight practice schedule because the Growlers fly over or near Rhodoendron Park during ball practice, and I'm concerned about the noise and health impacts the increased flight schedule could have on my kids while they're attending Coupeville Elementary School. Last year, my 4 year old daughter played T-Ball for Central Whidbey Little League. During practice at Rhododendron Park, I had to take her home in tears because of the loudness and proximity of the jets. We cannot in good conscience submit our children to the noise levels experienced on the fields when the Growlers are flying, so we no longer are able to participate in sports that use the Rhododendron Park. At home we have to use heavy-duty ear protection to do outdoor work or if our children need to leave the house when the Growlers are flying. We will be unable to continue gardening if the number of flights is increased as proposed in Scenario A. Our dogs do not like to be outside when the jets fly and will have to be kept indoors or given away. I'm concerned that the value of our home will decrease if the flights are increased. I'm also very concerned about the safety of Coupeville's well water. More flights equal the increased likelihood of accidents, which can not only impact the safety of the people living under the flight path, but the safety of our water. I'm deeply saddened that Central Whidbey will also lose its local farms where we can easily purchase produce because they will be unable to continue operating under the noise of increased Growler traffic. I am extremely concerned about the affects it would have to the local economy and agrarian culture, as many activities that tourists enjoy in or at Ebey's Landing National Historic Reserve, Casey Conference Center, Fort Casey State Park, and the Pacific Rim Institute would become unpleasant, if not impossible. I am in favor of the EIS Scenario C, or a scenario that does not increase the number of Growlers or flight practices at Coupeville OLF. Thank you for hearing my input.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 2.l. No Action Alternative
- 2.m. Record of Decision/Preferred Alternative
- 4.o. Classroom Learning Interference
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.j. Impacts on Outdoor Sports

Seattle, WA 98108

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.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 10.l. Bird Migration
- 18.a. Climate Change and Greenhouse Gases
- 18.b. Average Carbon Dioxide per Aircraft
- 19.d. Electronic Warfare

Boulder, CO 80301

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) 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

- 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

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,

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 U.S.M.C. (retired)
- 4. City, State, ZIP Anacortes, WA 98221
- 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.a. Purpose and Need
- 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.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

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:

How do you concentrate? How do you talk on the phone? How do you conduct meetings? They fly directly over our home. This has never been acceptable.

Please dispense with the patriotism / Freedom nonsense. This is boys having fun in their airplanes. I know.

1.a. Thank You

Mirror Lake, NH 03853

I was assigned to Whidbey Island as a LT for almost 5 years, and served most of my time in VAQ-134. OLF was critical to our operations and I am certain remain critical to crew proficiency today. Please maintain the airfield for aircrew use. It's hard to overstate how important it is / was for the aircrew.

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*)
 _____ *Coupeville Wharf*

3. **Address** _____ *Coupeville WA 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:

*This water pollution issue is huge!
 What are we — Flint Michigan?
 This is a Sole-Source aquifer 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.

For more information, see, **Coupeville Community Allies**, 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.

Seattle, WA 98108

Please conduct a full and thorough EIS that surveys the impacts to: Marine life (especially sonic pollution, but also impacts of a potential crash) Residents (sonic and air pollution) Air quality (from exhaust) Safety of residents

- 1.a. Thank You
- 1.d. General Project Concerns
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted

Oark Harbor, WA 98277

My comments follows: 1) As OLF Coupeville provides more realistic training environment for FCLP, maximum use of OLF Coupeville should be used for applicable training. I am in favor of Scenario A (20% in Ault Field & 80% OLF Coupeville) for the best training environments. 2) What are the social economical impacts & migration measures on housing & education facilities with the increases in navy personnel with alternates 1, 2 & 3? 3) Concern on number 2 are: a. Housing: increase in demand of housing would drive up the cost of rental for the low income citizen that can ill afford the cost b. Education: increase in demand on requirement of school would drive up the cost of home owners c. Traffic: Increase in traffic and the associated accident risks along Highway 20 to mainland if sufficient housing is not available within Whidbey Island & Anacortes area.

██████████ Oak Harbor, WA 98277 ██████████

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.i. Housing Access and Affordability
- 14.a. Transportation Impacts
- 14.b. Vehicle Collisions and Safety
- 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.*

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

2. Organization/Affiliation

3. Address COOPEVILLE

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 DON'T UNDERSTAND WHY THE NOISE ASSESSMENT WAS DONE USING A COMPUTER MODEL. THAT IS INACCURATE AND DOES NOT ACCURATELY MEASURE THE NOISE LEVEL IN MY COMMUNITY (CROCKET LAKE ESTATES) INDEPENDENT MEASUREMENTS HAVE BEEN DONE THAT SHOW IT OVER 90 AND AT TIMES OVER 100 - NOT 65!!!

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.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.f. Noise Measurements/Modeling/On-Site Validation

Port townsend, WA 98368

Please understand my comments are tempered with a strong positive base of personal support for our various military institutions with history of multiple family service commitments. As nurse practitioner with more than 40 years experience and ongoing education I count my health as my greatest treasure. Clearly per all objective measurements and EPA guidelines an increase in flights after 6pm and before 6 am will disrupt my ability to relax and attain adequate sleep basic to good health. Flights over our region causing decibel level noise greater than 55 will impact all outdoor activities and any above 65 will cause hearing loss. I believe alternate training formats have not been adequately explored and oppose implementation of the increased flight schedule.i

- 1.a. Thank You
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

Friday Harbor, WA 98250

I am a resident and property owner in the center of San Juan Island. My family frequently experiences the low grumble and vibrations of the Growler activity on Whidbey Island. It is disruptive and disturbing to have the usual calm and quiet of this island be invaded by this noise. The Navy falsely considers San Juan County (SJC) as a “no significant impact area” – this disturbance clearly has significance on our lives. Analysis in the 2005 and 2012 Growler Environmental Assessments (EAs) is inadequate and incomplete. The Growlers were moved to NASWI without a full EIS and without sufficient study of the following impacts to San Juan County and the region: noise impacts, health consequences, impacts to wildlife and ecosystems, and economic impacts. Further, both the 2005 and the 2012 Environmental Assessments were deficient by not adequately planning for the mitigation of noise from the Growlers. The Navy must enhance the analysis in order to support proposed actions in the Environmental Impact Statement (EIS). The EIS should study and include the following:

- Noise Measurements – The DEIS includes noise level studies using NOISEMAP Version 7.2. This is outdated software. The studies should use the latest software (Advanced Acoustic Model, developed in 2010 to replace NOISEMAP). Noise level studies should include accumulative sounds from simultaneous flights – a realistic model. The draft EIS states on page 3-16 that aircraft noise levels represented in this draft EIS are “generated by a computer model and not actual noise measurements at Ault Field or OLF Coupeville.” Actual noise levels studies need to be conducted, i.e. actual near-field and far-field noise measurements of Growlers under varying operation conditions on site and nearby, inclusive of Island and San Juan Counties.
- Health Impacts to San Juan County citizens – Medical surveys studying the health effects of startle reactions should be conducted on the impacted populations of San Juan County. A survey of the residents in San Juan County should document the extent of the problem of sleep disturbance. Mitigation should include notifying citizens in advance of all Growler training operations at either airfield including Field Carrier Landing Practice (FCLP) and Controlled Carrier Approaches (CCA). In addition, the full EIS must specifically address:
- Impacts to the San Juan Islands National Wildlife Refuge, which is a part of the National Wilderness Preservation System as designated by Congress to be a wilderness area “where seabirds, eagles, and marine mammals will have an undisturbed place to live and raise their young”.
- Impacts to San Juan County’s economy, which is dependent on tourism and its reputation as a prime destination for those seeking to live in a peaceful place with abundant outdoor recreational activities.
- Impacts to the San Juan Islands National Monument and in particular the Iceberg Point Area of Critical Environmental Concern (ACEC) and the Point Colville ACEC. The 1990 Management Plan (a NEPA document) for these properties exists to protect the natural qualities of these ACEC properties.
- Impacts to San Juan County’s property values for those properties most affected by Growler impacts and including any potential redistribution of property tax burden to San Juan County property owners that are not directly affected. It is clear to those of us who live here, that the introduction of the Growler is negatively impacting San Juan County. The EIS should fully evaluate one or more alternatives that bases Growlers at a location other than NAS Whidbey Island. There are other possibilities where Growler training and basing can happen and these alternatives should be fully considered. I ask that the Navy

- 1.a. Thank You
- 12.h. Tourism
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 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.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

redo the noise assessment analysis using updated software such as Advanced Acoustic Model and make actual noise measurements of Growler operations in Island and San Juan Counties, so that the citizens can comment on actual data for the noise exposure and impact analyses. Thank you for consideration of these comments.

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Coupeville, WA 98239

Commander, Whidbey Island Naval Air Station Subject: Statement in Support of the EIS for EA-18 Growler Airfield Operations at NAS Whidbey Island Complex These are my personal comments in support of the planned increase in flight operations of EA-18G Growler airplanes at Ault Field and OLF Whidbey Island, as discussed in the EIS. I have downloaded the entire EIS and have read various sections in detail and scanned the entire document. I commend your staff and the Navy for the extensive investigations and detailed report of your studies. I believe that you have done a very good job of analyzing all the various scenarios and the various impacts, and have provided an honest assessment of these investigations. I have a home in the Race Lagoon area within most likely a mile or so of OLF Coupeville Whidbey Island. I have witnessed the OLF touch and go flight training by the Navy pilots many times. I recognize the noise inconvenience at some times due to the training at OLF, but I must say that I accept this inconvenience. I have read and understand the assessment done in section 3.2. I can tolerate this impact. It is the sound of Freedom that I value. I fully understand your assessment summarized in section 1.4 of the EIS that indicates that OLF is a very good training location to simulate carrier landings with the terrain, altitude, nearness to main base, water nearby and remoteness and lack of housing in the vicinity of the OLF. This all helps to simulate the environment and challenges of carrier landings. I am an engineer and understand a fair amount of the data and analysis that was done for this report. I recognize and fully understand as you discussed in section 2.2 that simulator training cannot replace actual conditions of a carrier landing, and only real life actual situations and practice in the most similar of conditions can train a pilot to perform actual carrier landings. This is probably the most dangerous of activities a naval aviator must perform and I fully support the need for our Navy aviators to train to be safe. OLF provides that environment. I have been fully supportive of the Naval training that must be done from Whidbey NAS. I value my freedom and my privilege of being a US citizen. As such, I fully understand the value and need of the military and especially the Navy to keep me and my family safe and protected. The sophistication of the F18 jets and the difficult missions they must perform demand our pilots to be the best they can be. It requires they get the best training they can get in order to safely perform their duties and maintain the plane and the safety of people nearby. There should not be any compromises made at the risk of our Navy pilots. I support Scenario A with whatever Alternative the Navy deems is necessary to keep the adequate training and availability of your mission, which is the ultimate protection of all of us in the USA, through the training performed at Whidbey NAS and OLF. You are doing your part and I am doing mine in a small way in supporting your efforts. I thank you and all the people at Whidbey NAS for all they do. Signed electronically: [REDACTED] Coupeville, Washington

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.

The Growlers are affecting our quality of life. -

They are changing our retirement life -

adding more jets is a bad idea - our little Island cannot handle this noise. -

It was so peaceful when I was growing up - now I cannot tolerate the noise. Older people deserve better!

For more information, please visit the project website at 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

Langley, WA 98260

As an Island resident for over 30 years who has lived with NAS Whidbey, OLF and the A-6's, I believe your EIS is lacking in the following areas: 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. 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) 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). 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

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.c. Wildlife Sensory Disturbance and Habituation
- 11.d. Per- and Polyfluoroalkyl Substances
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.d. Program of Record for Buying Growler Aircraft
- 2.i. Proposed Action
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 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
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources

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, piecemeal 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 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. 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. 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. 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. 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. 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 contend 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. 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. 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. I believe you failed both in letter and spirit in putting together a viable EIS. [REDACTED]

Port Townsend, WA 98368

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,
 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) 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: • 4 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); • 2015 EIS discussing electronic warfare training and testing activity; • The current 2016-2017 DEIS (36 Growlers); • 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

- 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.d. Day-Night Average Sound Level Metric
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- 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

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] Port Townsend, WA 98368

Freeland, WA 98260

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

I am surprised to hear about the magnitude of increased flights over the island of Whidbey. I fully support the training of our pilots, but do think they have to fly over more of Whidbey's land mass. Seems like tempting fate un necessarily.

Oak Harbor, WA 98277

My main concern with the EIS is 2 fold: 1) It assumes that the additional jets are going to be stationed at NAS Whidbey. There is no other option considered. The only options are how much the impact of this expansion will affect Coupeville (OLF) or north Whidbey (Ault Field). The wisdom of consolidating all of the Navy's weapons of one kind in one location brings up memories of Pearl Harbor. A nearly 6 fold increase in flight operations will have a huge impact on our community, regardless of the option chosen. 2)The EIS uses no actual sound measurements, but discusses theoretical averages instead. To me, the actual impact noise of a plane passing overhead at low altitude with its wheels down and tail down is a critical component that shows up nowhere in the EIS. I have personally experienced noise readings of planes flying overhead of 132 db to 137 db on a consistent basis. To average these events over a period of time is like saying that the impact of being close to an explosion can be mitigated by averaging in the silence on either side of the event. I understand that the Navy doesn't have to comply with OSHA standards, but OSHA has done extensive studies on the effect of noise and their charts only go to 120 db! If you extrapolate their noise exposure chart to 130 db it would only take .3 (three tenths) of a second to cause damage to the human ear.

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

Oak Harbor, WA 98277

I was a Navy Officer during Viet Nam and am proud of my service. I am a lifelong fan of the Blue Angels and go to see them at Seafair every year. I am NOT anti-Navy. I have read the Exec Summary of the EIS and believe that there is a significant omission. Let me explain by giving a true story...I was at the Crockett Farm two years ago helping the owner with some building repairs. FLPCs were underway at the OLF. Growlers were flying over us with their wheels down and tail down, low enough so that we could read the words on the side of the planes. We measured the Db level with a hand held Db meter and over 7 passes the Db readings were 132 to 137! To measure the impact of this noise by averaging the Db level over time is like describing the noise of an explosion as insignificant because over a 24 hour timeframe, it was silent for all but 5 seconds. 130 + Db levels are a risk to human health. OSHA has a graph showing time vs. Db level exposure relative to ear damage. The chart only goes to 120 Db. If you extrapolate that chart to 130 Db, the time of exposure that would cause damage to human hearing is tenths of a second! When measuring the impact of noise, I urge you to look at peak noise levels as well as average noise.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss

Oak Harbor, WA 98277

Whidbey Island is not an appropriate place to send more EA-18G Growlers. Environmental concerns have already arisen with regard to some of our local wells. Nothing could be more fundamental to human life than safe drinking water! It's important that no further EA-18G's be assigned to Whidbey Island until this matter has been thoroughly studied, including tests of ALL wells in the northern half of the island. Furthermore, even though the Navy does not acknowledge it, citizens' health and hearing have been affected due to the noise issue at Coupeville OLF and NAS. And finally, not related to EIS but still important-- have we learned nothing from WWII Pearl Harbor? It seems a bad idea to put all of our west coast EA-18G's on Whidbey Island. What a nice big target they would make for the North Koreans or for terrorists. Please do not send more EA-18G's to Whidbey Island. Thank you.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

1.a. Thank You

Coupeville, WA 98239-3436

The geo-political parameters of an ever changing world require the best equipment and situational environment and facilities for US Navy aircrews to practice under. Landing a jet aircraft on a small piece of steel pitching to and fro in the middle of the ocean is not an easy thing to accomplish. This effort requires a lot of practice. This ensures their safety and accuracy and eventually the safety of all of us. I fully support any plan for continued FCLP's at the US Navy Outlying Field near Coupeville. These men and women of the US Navy have agreed to serve us all, have sworn an oath to protect and defend us and are freely willing to sacrifice their lives for us if necessary. Ensuring our continued support of their mission is the LEAST we can do for them.

Port Townsend, WA 98368

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) 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: 4 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); 2015 EIS discussing electronic warfare training and testing activity; The current 2016-2017 DEIS (36 Growlers); 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,

- 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

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 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,

Coupeville, WA 98239

I am greatly concerned about the Navy's plan to increase operations on Whidbey Island, specifically in the area near OLF, the surrounding area of Central Whidbey. I feel the need to comment on the action outlined in the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at the NAS Whidbey Island Complex before the end of the comment period, January 25, 2017. I have tried to review the current EIS and have attended meetings in the last couple of weeks to understand what is happening. My concerns are as follows: 1. The EIS is far too large and complicated for the normal resident to absorb and understand in such a short period. And the fact that the comment period happens over a holiday period has me concerned that others who should know about this will not have a chance to voice their concerns in this timeframe. I sincerely hope this was not done deliberately. We are talking about actions that greatly impact this community and the community needs an appropriate amount of time to learn, understand and respond. The timing of this is not acceptable, we need more time. 2. I have not been opposed to how operations run today, but increasing growler flight operations from 6100 to 35100 is not acceptable. The peace and quiet we know in our community will no longer exist if we hear jet noise every day, and several times a day. 3. I have experienced jets flying over my home and like many other neighbors and friends have to stop talking to each other when this happens. The EIS claims a noise study has been completed (by the Navy) and that the noise level and the increase in noise frequency will not have an impact on residents hearing. If it is loud enough for people to have to stop talking, how can that not affect your hearing? I would prefer an independent study be done on this and not an internal Navy team. This is a biased opinion, it is always a good decision to have a 2nd opinion when you are talking about your health. We have children in our Coupeville schools that will directly be impacted by this increase- every day and often many times a day. How can they not be affected by this disruption? 4. The EIS describes a larger area than current identified flight zones as well as expanded and additional crash zones. I live here. I am greatly concerned about my safety and the safety of my family, friends and other community members because of this increase. 5. This increase in operations will greatly impact the value of my home. My property value will certainly decrease substantially as it will become a less desirable place to live. And if I need to sell, the sale will be difficult. 6. Whidbey Island is a place people live and come to because of peace and beauty that exists here. Tourists will stop coming. Who would want to camp, hike, birdwatch, whale watch, and enjoy the natural resources our area has to offer if they can no longer enjoy it without the interruption of several jets circling overhead. This will definitely impact our economy on Whidbey Island. Family gatherings and community events will be greatly impacted by the interruptions. I believe many others in our community have the same concerns and more. We sincerely hope you consider our voices in this EIS process. [REDACTED]

- 1.a. Thank You
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Coupeville, WA 98239

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- 1.a. Thank You
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

1.a. Thank You

Coupeville, WA 98239

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Coupeville, WA 98239

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5.a. Accident Potential Zones

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1.a. Thank You
12.j. Property Values

Coupeville, WA 98239

This increase in operations will greatly impact the value of my home. My property value will certainly decrease substantially as it will become a less desirable place to live. And if I need to sell, the sale will be difficult.

Coupeville, WA 98239

Whidbey Island is a place people live and come to because of peace and beauty that exists here. Tourists will stop coming. Who would want to camp, hike, birdwatch, whale watch, and enjoy the natural resources our area has to offer if they can no longer enjoy it without the interruption of several jets circling overhead. This will definitely impact our economy on Whidbey Island. Family gatherings and community events will be greatly impacted by the interruptions.

1.a. Thank You

12.h. Tourism

12.n. Quality of Life

7.d. Recreation and Wilderness Analysis and Study Area

Coupeville, WA 98239

- 1.a. Thank You
- 4.o. Classroom Learning Interference

The Coupeville Schools should be included in the sound study. We have to consider the impact this noise increase will have on our children.

Port Townsend, WA 98368

I already experience the impact of this noise from across the straits. I am concerned not only for myself, but my autistic grandson who is extremely sensitive to this noise and environmental pollution. PLEASE STOP destroying our beautiful sanctuary. 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. [REDACTED]

- 1.a. Thank You
- 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
- 4.r. Nonauditory Health Effects

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

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.

1.a. Thank You

Anacortes, WA 98221

The training at Coupeville is critical to our aircrews proficiency when operating around the ship. Let them bounce! Go Navy.

- 1.a. Thank You
- 5.a. Accident Potential Zones

Oak Harbor, WA 98277

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- 1.a. Thank You
- 5.a. Accident Potential Zones

Oak Harbor, WA 98277

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- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life

Oak Harbor, WA 98277

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<http://earthquake.usgs.gov/earthquakes/eventpage/uw61251016#map> that run under or near. Section 3.14.2.3 in the DEIS inaccurately states that the most recent significant seismic event was 18,000 years ago. There is well documented research establishing that there was a major event in the 1700's. (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) There is evidence of deposits from four tsunami events in Swantown Marsh near Ault Field in the last 2,200 years.

http://cascadiageo.org/documentation/literature/cascadia_papers/johnson_et_al_204_utsalady_puget_lowland.pdf as well as multiple established geologic fault lines that run under or near Ault Field and the OLF. The final EIS should address the actual risk of a major seismic event with more accurate and complete scientific research. Other Risks: The island is accessible only by ferry or a two lane bridge built in 1935 with a disturbingly low sufficiency rating

http://www.goanacortes.com/news/article_e5c08ba6-bb37-5940-a464-48438d6a7a41.html. The bridge also supports the transport of both natural gas and water electricity to Whidbey. Washington state ferries, the other primary access method, are widely recognized as one of the nation's top risks for terror attacks.

<http://www.seattlepi.com/news/article/Ferries-a-top-terror-target-FBI-cautions-1201667.php> Additionally, the runways at both Ault and OLF are clearly visible from state highway or major roadways. The final EIS should completely address the risks of siting all of the nation's electronic warfare resource at this vulnerable location. Thank you for the opportunity to submit this comment.

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)

Oak Harbor, WA 98277

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- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
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Concerning Impacts to Cultural and Historic Sites: The DEIS' defined Area of Potential Effect (APE) for cultural and historic resources is tightly drawn and as a result omits mention of impact on several important impacts on nearby historic and cultural properties as confirmed in correspondence from the WA State Department of Archeology and Historic Preservation.

http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx The letter states that cultural and historic sites within existing APE will be adversely affected, and that additional portions of Whidbey Island, eastern Olympic Peninsula and the San Juan Islands also would receive harmful noise exposure levels from EA-18G activity. The US Department of Housing and Urban Development established 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."

[file://localhost/\(https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control:\)](file://localhost/(https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control:)) Residents in my neighborhood, six miles from the OLF, have recorded noise levels 75 – 90 dB. The final EIS should include and consider these effected communities as required by the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). Thank you for the opportunity to comment on the DEIS.

1.a. Thank You

8.a. Cultural Resources Area of Potential Effect

8.b. Section 106 Process

8.c. Noise and Vibration Impacts to Cultural Resources

Oak Harbor, WA 98277

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Concerning Alternatives to Reduce Noise: The DEIS does not put forth any alternatives that would reduce noise impacts. NEPA §1506.1 states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." The President's Council on Environmental Quality (CEQ) states, "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."

[file://localhost/\(https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf](file://localhost/(https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf) The Navy's DEIS provides three alternatives that are essentially choices about how to distribute the same number of flight operations between Ault Field Oak Harbor and OLF Coupeville runways. The final EIS should include consideration of other alternative operational sites including those used currently as well as others in the region.

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

- 1.a. Thank You
- 5.a. Accident Potential Zones

Oak Harbor, WA 98277

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Concerning Noise Impact and Noise Modeling: The DEIS does not include actual noise measurements of flight operations at OLF. Actual peak noise measurements for several locations should be made for the EIS. 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. These measurements were dismissed as faulty in the DEIS without documentation. The Navy's own research on the noise modeling method used in the DEIS questions the accuracy and validity of the method. The Department of Defense's Strategic Environmental Research and Development Program found NOISEMAP ver 7.2 to be outdated and unable to provide "legally defensible aircraft noise assessments of current and future aircraft operations". Additionally, the noise modeling approach was created to measure noise from commercial airports and planes rather than from Growlers conducting repeated FCLP's. Additionally, 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 averages noise with quiet over the course of a year to come up with a 65 dB average. As a result peak noise levels in these un-measured and un-modeled communities may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. The final EIS should use a method of noise assessment tool that is appropriate to accurately measuring the Growler noise exposures on the area near OLF. The DEIS noise analysis also emphasizes higher frequency noise exposures in the range of 1,000 – 4000 Hz. (DEIS p A-142) However, the Growlers emit substantial low frequency sounds that aren't reflected in the DEIS analysis and the Navy's acknowledges this exposure in 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, Department of the Navy, pages 38-39, Wyle report WR 10-22 . "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." The final EIS should include measurement of low frequency noise as well as use a more accurate high frequency assessment method. Thank you for the opportunity to comment on the DEIS.

- 1.a. Thank You
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.j. Other Reports

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

Oak Harbor, WA 98277

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Concerning Water Resources: The DEIS states (Page ES-9) "There would be no significant impacts on water resources from construction activities or operation of new aircraft." In the "Hazardous Waste and Materials" section (ES 10) the DEIS states, "The existing practices and strategies would successfully manage the use and disposal of these materials." Again on page 4-285 the DEIS states that "Hazardous waste management activities would follow existing procedures for the safe handling, use, and disposal of hazardous substances and waste." Recent news regarding a large dioxane contamination plume from Ault Field and per- and polyfluoroalkyl groundwater contamination near to OLF sharply contradict the Navy's assertion of no significant impacts.

<http://www.whidbeynewstimes.com/news/navy-tests-show-contamination-in-two-central-whidbey-wells/> These two recently revealed exposures suggest that the Navy's "existing practices" for management of hazardous materials related to operations are inadequate. At this date, the full extent of the contamination is not yet known as the Navy installs test wells and samples water from nearby wells. We do know that Coupeville's town water has been contaminated by PFOA's and PFOS and that seven private wells near OLF have tested well above 70 PPT. The ongoing investigation must be complete before the full extent of contamination is known. As a result, the DEIS section on impact on water resources is incomplete. The final EIS should be updated with emerging information and include full documentation of contamination, steps to remediate and compensate those impacted citizens. Thank you for the opportunity to comment.

Burlington, WA 98233

Please evaluate low frequency noise impacts. Please analyze noise in the field, not with only with computer simulations. I understand the computer model used to analyze noise is outdated. If so, please use updated software. Please average jet noise during times jets are flying, without including long periods when they are not, to gain a more accurate measurement of impacts. Please use the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe" to analyze long-term health impacts of noise. Please include the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. Please evaluate noise over the San Juan Islands National Monument. Please include using drones instead of piloted jets to consider noise reduction. Please evaluate jet noise in all counties that are impacted, that is, add San Juan, Jefferson and Clallam Counties. Please commit to real noise mitigation in the Final EIS. Please address these concerns in a supplement to the EIS and allow for further public comment.

- 1.a. Thank You
- 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.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.l. Points of Interest
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

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 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

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

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

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.

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

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:



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

2. Organization/Affiliation

3. Address Cooperville 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

please carefully evaluated what your doing, flying less than 1,000 ft over our homes late at nite or anytime is violatin our rights as private land owners you certainly demonstrate your LACK of concern for the public. please ~~and~~ consider the attitude of your military personnel, the navy doesnt own this island, But the military thinks they do. check out what your damned pilots do when they fly over our homes.

Stop Flying

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.i. Runway Operating Hours and Flight Schedules

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, citizen, business
3. Address [Redacted] Greenbank
98253
4. Email [Redacted]

PRIORITY = SAFETY ! SECURITY ! SEE ->
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:

PRIMARY: SECURITY !! SAFETY !!

- 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:

water/fuzet sound

Whidbey Island is surrounded by large barges & ships that can easily bring bombs & other explosions to growlers (All of them!) & the whole region - This is a sitting target like Pearl Harbor to have ALL growlers in one spot. Also Bangor is so close w/ its large stockpile of nuclear missiles. Also PAINE field is expanding air traffic. ALL SECURITY & SAFETY MAJOR

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.

ISSUES!

For more information, see, Coupeville Community Allies, 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.

Anacortes, WA 98221

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)

Anacortes, WA 98221

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

Anacortes, WA 98221

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

I have lived in Port Townsend facing Port Townsend Bay for 13 years since retirement. The noise of Navy jets from the Navy Air Station on Whidbey Island, especially those practicing landings at the Outlying Field at Coupeville, has disrupted my enjoyment and use of our home and garden during this time except for those few periods when the Navy stopped its training flights. I am a Board member of Disability Awareness Starts Here (DASH), a group that advocates for accessibility for all. Through this affiliation and also through the experience of living in an area with many older people I have become aware of the large numbers of people with hearing problems. By age 65 one in three people has a hearing problem. About 10% has tinnitus. These people are especially affected by noise such as that caused by low flying military aircraft. The older population is also affected by high blood pressure and other disorders such as Multiple Sclerosis that are sensitive to the effects of noise. Although the noise of the jets affects the whole population, people with disabilities and the over 65 population are especially impacted. Although the Navy accepted Public Comment on the EA-18G Growler Airfield Operations at Naval Air Station, it appears that it has not obtained independent studies on the various issues that members of the public have raised, such as the impact of aircraft noise on health and well-being. Independent studies were among the recommendations made by members of the public. The EIS as written by the Navy appears to have been selective in using data that fail to reflect the actual impact as experienced by residents of the area. 1. The DEIS has failed to show that the population living around the Naval Air Station on Whidbey Island and the Outlying Field are not experiencing health problems related to the noise of the Growlers. A study should be conducted to determine the impact of the noise of the Growlers on the population and which residential areas are affected. Residents in Coupeville, Port Townsend and the San Juan Islands should be asked about the impact of the aircraft noise on specific aspects of their health and well-being, including tinnitus and hearing loss. 2. The cumulative impact of the Growler training programs has not been adequately assessed. The cumulative impact assessment should include the increase of noise since operations first began on Whidbey Island. The purpose of assessing cumulative impact is to give an accurate assessment of how the total Navy operations affect the environment, the economy, and the health and well-being of residents. The Navy is ignoring the fact that the increase in Growler operations on Whidbey Island together with the overall plan for electromagnetic warfare increases the cumulative impact on local population, the environment, visitors to the area and wildlife. 3. Actual sound measurements at key locations where both humans and animals are affected have not been carried out. Simulated studies of noise are not sufficient to assess the sound levels. The measurements should include noise of different frequencies including the low frequencies that disturb many people. The intensity of Peak Sound Level (Lmax), the number of such events, the time of day of such events and the location of events that are above 60 dB should be included in the assessment. Measurements should be conducted at night and during the day and in locations where children play and attend school, in addition to other selected locations. Studies should evaluate medical impacts such as blood pressure, mental well-being and sleep. Other aspects of well-being such as enjoyment of one's property within sound of Growlers should also be studied. 4. Studies should be conducted on the impact of jet noise on

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.n. Quality of Life
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.n. Alternatives Considered But Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 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
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 7.d. Recreation and Wilderness Analysis and Study Area
- 8.b. Section 106 Process

children, especially those living, playing and attending school in the impacted area. The impact on pregnant women should also be included. 5. The DEIS does not adequately address mitigation measures for reducing the noise from the OLF. Adequate mitigation would go a long way towards resolving some of these issues. 6. The impact of the noise on the quality of life and economy of the affected area has been under-estimated. The noise has a negative effect on leisure activities such as sailing, hiking and gardening and this in turn reduces the desirability of living and visiting the areas. This cannot be reduced to a matter of financial loss to the economy. There are better ways of assessing impact on quality of life and these should be used. 7. In assessing the impact on the Ebey's Landing National Historic Reserve experts familiar with the National Historic Preservation Act and Section 106, plus interested parties such as those who live in the Reserve, tribes and Historic Preservation officers should have conducted the evaluation. 8. The safety of exercises at the OLF should be evaluated in light of the close proximity to resident's homes and businesses. The DEIS gave inadequate attention to moving the Landing field to a location away from residential areas.

Chimacum, WA 98325

I am commenting because I feel that the Navy has been dividing up a massive expansion effort in a way that makes it seem reasonable for any one part, but in whole is unreasonable. A few years ago the Navy requested permission to do Electronic warfare testing in the Olympic National Forest. The Navy claimed that they did not need to do an Environmental Impact Statement because their would be no increase in the number of Growlers flying over the wilderness areas (Olympic National Park and Forest). I am strongly opposed to the Grouler increase because they will bring extreme noise pollution to an intact ecosystem that currently experiences "natural silence". The noise of the growlers will harm wildlife, and disturb humans who go to these few remaining sacred places to get away from human noise.

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

7.d. Recreation and Wilderness Analysis and Study Area