



# Public Meeting Comment Form

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

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

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

- 1. Name [REDACTED]
- 2. Organization/Affiliation N/A
- 3. Address [REDACTED], 98221
- 4. E-mail ~~☐~~ [REDACTED]
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

We need these AIRCRAFT & you have my support.

Thank you.

[REDACTED]

1.a. Thank You

Please print • Additional room is provided on back

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

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

**YOUR INPUT MATTERS**

## Draft Environmental Impact Statement 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 of the United States of America*

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 include 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 Environmental Impact Statement (EIS):

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

(over)

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.i. Runway Operating Hours and Flight Schedules
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 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.

**Additional Concerns:**

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

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

My number one concern is loss of life when a casualty should occur, be it pilot error or bird strikes. They fly very low over a populated birding area at the beach besides killing birds and driving them away.

#2 concern is my hearing loss, I'm forced into my home to wear sport shooting earmuffs, closing windows, you cant work, watch T.V. or sleep as they fly late into the night.

They fly 4 to 5 hours with out breaks for us and don't provide accurate flying schedule for planning purposes

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, go to **Coupeville Community Allies**, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

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

Victoria, British Columbia V8P3C2

The rumbling from jets is disruptively loud, shakes our house and even sets off car alarms. Please route the jets so they do not fly over Victoria BC.

1.a. Thank You

3.a. Aircraft Operations

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

, WA 98133

1.a. Thank You

4.r. Nonauditory Health Effects

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

TO Whom It may concern: I strongly discourage the navy from adding 36 more growlers to the Whidbey fleet. The noise pollution is damaging for animals and humans. I say NO MORE!! -A Seattle Resident



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
3. Organization/Affiliation TRANSTION LOPEZ ISLAND
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

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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

- 12. Add your own comments here:

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Oak Harbor, WA 98277

the Navy has not addressed these issue in the EIS. 1. Water contamination to the aquifers around the base that are peoples sole sources of water. 2. Actual Noise Measurements were not made. Noise modeling is outdated and noise averaging is inappropriate. Individual measurements made by the National parks services shows noise levels far in excess of that of the predicted by average modeling. 3. Alternatives to using coupeville OLF were not adequately addressed. as their are much better suited location for these fighter/high performance jets that have millions of acres. 4. Jet Noise and Pollution reductions were not thoroughly addressed. 5. Crash frequency and impacts to local emergency services were not addressed. 6.Impacts on our children is not adequately addressed: Childhood learning disability's & hearing damage, impacts on students at all schools and parks in the flight area of these EA-18G fighter /high performance jet. 7. Economic impact on tourism and u-pick farm business, property value loss, declines of the civilian population and loss of business is not addressed adequately. 8. Impact to natural resources is not addressed: bird migration and animal habitat; impacts on Ebay's landing National Historic reserve & Deception Pass State Park and all aspects of outdoor recreation . 9. Frequency and effects of fuel dumping is not addressed.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve

Providence, RI 02906

I lived many years in the Pacific Northwest and have dear friends who live on Whidbey Island. Their lives have been dramatically affected by the Growler jets present on the island, and that is w/o the proposed build-up! The noise level of these jets makes it impossible for residents on the island - many who have been there for generations - to be able to live in a healthy and sustainable way. I would hope that the well-being of civilians would be THE top priority of the Army/Navy of the U.S., resulting in the removal of Growler operations from the island. I mean, why protect the country and destroy the health and quality of life of U.S. civilians in the process! This includes children, who are affected developmentally by the noise levels. The final EIS needs to address the potential impact on Coupeville Middle and High School. Also, The EIS noise study needs to include actual sound measurements with appropriate sound measurement equipment. A DOD commissioned study found that the DEIS uses an outdated noise simulation model that is not appropriate for Growler engines. 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!

- 1.a. Thank You
- 2.a. Purpose and Need
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference

1.a. Thank You

4.r. Nonauditory Health Effects

Victoria, British Columbia V8T1S7

These jets area extremely disruptive and unsettling. My children and I have been suffering from sever anxiety, paranoia, insomnia, persistent reoccurring migraines, and depression ever since we've fallen subject to these horrible loud machines. The extreme increase in activities this past month are becoming unbearable.



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. With a large portion of the State of Nevada owned and used by the United States Military forces, I believe it would be advantages for the FCLP's to relocate to the State of Nevada for the safety of the citizens of Whidbey Island and the growing population in the area. With the toxic polluting of ground waters in the area the citizens of Whidbey Island have endured enough. Respectfully, [REDACTED]

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville

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

2/24/2017

*Dear Project Manager,*

*I am writing to you regarding the Draft EIS for the EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex, December 2016, to provide comments to be considered & addressed in preparing the Final EIS. My comments include; purpose, routes, noise, chaff, electromagnetic radiation, groundwater, & a conclusion. The grave implications of the Navy's proposal warrants much greater "intellect & decent purpose" for our security & liberty than the DEIS or these comments possess at this time. Thank you for welcoming public comments, with the extension to February 24, 2017.*

Sincerely,

[REDACTED]  
 [REDACTED], Port Townsend, WA 98368  
 [REDACTED]

## 1. PURPOSE

*\*The Navy's NEPA process should have made absolutely clear that electronic warfare training in potentially populated areas is their intent, and the public should have had the opportunity to be heard on the full scope of activity. The hard work of civilians who have for decades strived to make and keep the Olympic Peninsula a great place with a robust tourism economy as well as special designations such as World Heritage Site, Biosphere Reserve, National Marine Sanctuary, and Wild Olympics, now fear seeing our forests irradiated, our species extirpated, our silence disrupted, our seas blown up, our main bridge to the mainland closed unpredictably disrupting access to health facilities, our swimming, fishing, boating, hiking, natural habitat & residential areas used for military training exercises, and our drinking water, soil and air polluted.*

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.n. Quality of Life
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 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.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.c. Military Training Routes
- 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.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 6.g. Chaff
- 7.f. Impacts to Wilderness Areas
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 9.a. Consideration of Tribes

***\*\*Our neighborhood hears the rumble of touch & go's across the water from both Whidbey Island airfields, Ault & OLF, and the roar of fight tracks transiting directly over us, burning 1304 gallons of fuel per hour; 21 gallons of fuel per minute over our heads, into our air, water, and land. What can be a quiet sanctuary of decibels in the 20's is now increasing to over 100 db, significantly impacting our health & all that live here.***

***\*\*How many people are affected....over 120,000 living just on the peninsula... over 4 million visitors per year. What is the navy's definition of "unpopulated" and does that make a difference in where they fly? The map shows the part of Port Townsend where I live as being "unpopulated". (EIS Fig. 3 map)***

The Olympic Peninsula is home to over 120,000 people, full of natural wonders; many tourists and locals visit the [Olympic National Park](#) which attracts over 3 million visitors per year. The region's 200 miles of coastline have fostered the maritime and fishing industries. The labor market continues to develop, benefiting from the region's natural resources. The San Juan islands are spectacularly scenic and is a popular tourism destination. Today, tourism-related industries and retirement communities are a strong economic base on the Olympic Peninsula. In addition, Island County is home to 80,000 residents, with several state parks & protected areas. State of Washington, U.S. Census Bureau

***\*\*What are the true consequences of adding more growlers? I object to the EIS stated purpose, as the navy is already conducting training & testing activities; 36 more or 1 more or 100 more doesn't insure that the navy meets its mission. But "more" does mean that it will cost more on many different levels, from monetary to quality of life & life itself. How is the land, water, air, wildlife, & humanity affected? The EIS does not consider the full impact of the cumulative consequences.***

### **Military-Industrial Complex Speech, Dwight D. Eisenhower:**

“This conjunction of an immense military establishment and a large arms industry is new in the American experience. The total influence -- economic, political, even spiritual -- is felt in every city, every State house, every office of the



Federal government. We recognize the imperative need for this development. Yet we must not fail to comprehend its grave implications. Our toil, resources and livelihood are all involved; so is the very structure of our society. In the councils of government, we must guard against the acquisition of unwarranted influence, whether sought or unsought, by the military industrial complex. The potential for the disastrous rise of misplaced power exists and will persist. We must never let the weight of this combination endanger our liberties or democratic processes. We should take nothing for granted. Only an alert and knowledgeable citizenry can compel the proper meshing of the huge industrial and military machinery of defense with our peaceful methods and goals, so that security and liberty may prosper together. Disarmament, with mutual honor and confidence, is a continuing imperative. Together we must learn how to compose differences, not with arms, but with intellect and decent purpose. Because this need is so sharp and apparent I confess that I lay down my official responsibilities in this field with a definite sense of disappointment. As one who has witnessed the horror and the lingering sadness of war -- as one who knows that another war could utterly destroy this civilization which has been so slowly and painfully built over thousands of years -- I wish I could say tonight that a lasting peace is in sight. The worst to be feared and the best to be expected can be simply stated. The worst is atomic war. The best would be this: a life of perpetual fear and tension; a burden of arms draining the wealth and the labor of all peoples; a wasting of strength that defies the American system or the Soviet system or any system to achieve true abundance and happiness for the peoples of this earth. Every gun that is made, every warship launched, every rocket fired signifies, in the final sense, a theft from those who hunger and are not fed, those who are cold and are not clothed. This world in arms is not spending money alone. It is spending the sweat of its laborers, the genius of its scientists, the hopes of its children. The cost of one modern heavy bomber is this: a modern brick school in more than 30 cities. It is two electric power plants, each serving a town of 60,000 population. It is two fine, fully equipped hospitals. It is some 50 miles of concrete highway. We pay for a single fighter with a half million bushels of wheat. We pay for a single destroyer with new homes that could have housed more than 8,000 people. This, I repeat, is the best way of life to be found on the road the world has been taking. This is not a way of life at all, in any true sense. Under the cloud of threatening war, it is humanity hanging from a cross of iron..

The jet plane that roars over your head costs three quarter of a million dollars. That

is more money than a man earning ten thousand dollars every year is going to make in his lifetime. What world can afford this sort of thing for long? We are in an armaments race. Where will it lead us? At worst to atomic warfare. At best, to robbing every people and nation on earth of the fruits of their own toil. Now, there could be another road before us—the road of disarmament. What does this mean? It means for everybody in the world: bread, butter, clothes, homes, hospitals, schools—all the good and necessary things for decent living. ...He noted that in addition to military dangers, an arms race would place a domestic burden on both countries. Eisenhower talked of future peace and goals to unify Germany, removing occupying forces in Austria and minimizing what both sides would lose when spending so much of their wealth on armaments. He spoke of the consequences of putting so much effort into building weapons when that same effort could be put to better use feeding people. As a former general, he was supportive of a strong national defense, but he also hoped to reduce military spending so there could be an increase in funding for domestic programs.”

**DEIS: Navy PROPOSED ACTION**

The U.S. Department of the Navy (Navy) proposes to:

- \*continue and expand existing EA-18G Growler operations at the NAS Whidbey Island complex, which includes FCLP by Growler aircraft that occurs at Ault Field and 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.

The purpose of the proposed action is to conduct training and testing activities to ensure that the Navy meets its mission, which is to maintain, train, and equip combat-ready naval forces capable of winning wars, deterring aggression, and maintaining freedom of the seas. In its request for consultation, the Navy characterized the term of the proposed action as the “foreseeable future.” For

purposes of this biological opinion, we are defining “reasonably foreseeable future” based on climate-change modeling horizons that are likely to occur. It is our best professional judgment, based on a review of that science, that an analysis period of 20 years is the maximum duration for which we can provide a reasoned analysis. 7/16 nwtw ..fish & wildlife

## 2. ROUTES

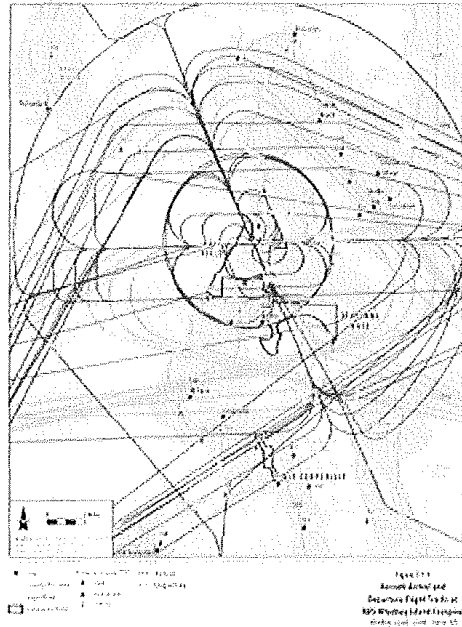
*\*\*Where are your military training routes?*

*The DEIS does not show the routes, & when I asked for more info in an email to the navy, I was referred to navy documents of 2005 & 2010 which also didn't show the routes, & was told that I could determine the routes by looking at the destinations. So the 2016 DEIS statement about avoiding noise sensitive & wilderness areas cannot not be really true. The navy does not need to avoid these areas because the exceptions listed describe the entire flight; i.e. "...no less than 3,000 feet except when in compliance an approved traffic or approach pattern, military training route, or within Special Use Airspace." Where is the noise data from all areas the navy is impacting? Where is a map that shows the flights path training exercise beyond arrival & departure? (EIS figure 3.1-3)*

*Where are these established flight corridors? The navy can't even establish this for the marbled murrelets or for the people.*

*The routes have not been identified on the EIS.*

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



*Email correspondence, December 2016:*

-----Original Message-----

Sent: Sunday, December 11, 2016 11:59 PM

To: NAS Whidbey Is PAO

Subject: [Non-DoD Source] flight tracks arrival & departure map

Dear Public Affairs Officer Mike Welding, I am looking at the December 2016 EIS , Flight tracks arrival & departure map, & would like to know if you could send me a map that shows the complete flight tracks from Whidbey Island, extending beyond this partial view.

Thank you,

On Dec 12, 2016, at 8:34 AM, "Welding, Mike T CIV NAS Whidbey Is, N01P" <michael.welding@navy.mil> wrote:

Ms. [REDACTED],

I'm not sure exactly how far and which direction(s) you are concerned with, but there are some robust maps in our Airfield Compatibility Use Zone (AICUZ) Study available here.

[http://www.cnrc.navy.mil/content/cnrc/cnrc\\_hq/regions/cnrnw/installations/nas\\_whidbey\\_island/om/environmental\\_support/jcr\\_content/par1/pdfdownload\\_1/file.res/NAS%20Whidbey%20Island%20AICUZ.pdf](http://www.cnrc.navy.mil/content/cnrc/cnrc_hq/regions/cnrnw/installations/nas_whidbey_island/om/environmental_support/jcr_content/par1/pdfdownload_1/file.res/NAS%20Whidbey%20Island%20AICUZ.pdf)

Dear Public Affairs Officer Mike Welding,

The file you have sent me contains over one hundred pages from a 2005 study.

The map I have a question about is from the 2016 EIS; Aircraft Arrival & Departure Flight Tracks.

I would like to see beyond the arrival & departure area, to include the entire flight track area; an extension of the map below.

Also, would you know the average speed & time from departure to when the aircraft are transiting the Port Townsend area?

Thank you,  
[REDACTED]

-----Original Message-----

From: [REDACTED]  
Sent: Monday, December 19, 2016 8:00 AM  
To: Welding, Mike T CIV NAS Whidbey Is, N01P  
Subject: [Non-DoD Source] flight tracks arrival & departure map

Thanks for the AICUZ 2010 study, Mike.

What I'm looking for are maps that show flight data (tracks, elevations, other data) over areas outside the immediate environs of NASWI, for example, when those flight paths go west, southwest and northwest off the edges of your maps, where do they go?

Specifically, I would like maps of flight paths for areas for which noise modeling has been done, such as in the West End, over the north side of the Olympic Peninsula, and over the south coast of Vancouver Island. If noise modeling has not been done there, the maps would still be helpful.  
[REDACTED]

Welding, Mike T CIV NAS Whidbey Is, N01P <michael.welding@navy.mil>  
To: [REDACTED]  
RE: [Non-DoD Source] flight tracks arrival & departure map  
Security: Signed (WELDING.MICHAEL.T.1139875210)  
[REDACTED]

I'm unaware of noise modeling in those areas. Noise modeling is typically done around airports and is considered the national standard. You could ask the National Park Service for noise monitoring they have done in the National Park.

Regarding your request about flight track information away from the base, you can check the Northwest Training and Testing Environmental Statement available here <http://nwtteis.com/> to understand where our Military Operating Areas are located. There are two primary areas to the west. That's where NAS Whidbey island aircraft go to when they leave the base here.

The military accounts for less than 40 percent of all aviation traffic over the Olympic Peninsula, an area used for such training for decades. To gain a complete understanding of flight routes in this region the agency that has oversight is the FAA.

The United States does not conduct noise modeling or measurement on the south coast of Vancouver Island; perhaps the regional Canadian government has as it's their sovereign territory.

Hope that helps.

Mike

### 3. NOISE

*\*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.*

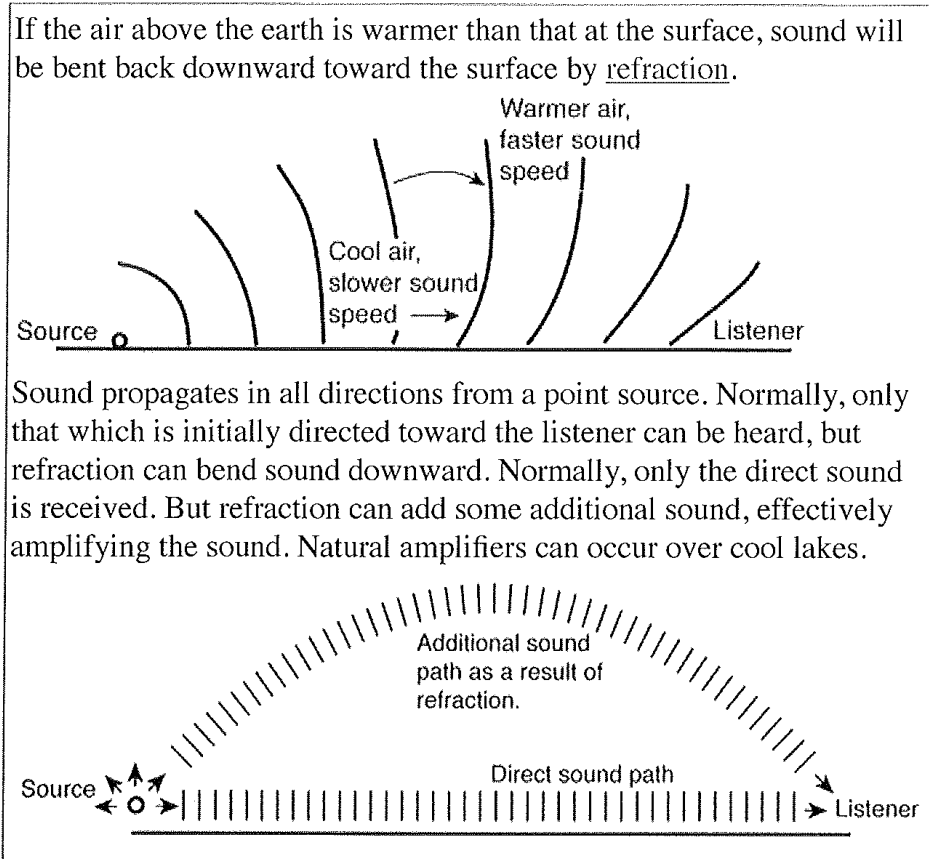
*Eleven military mobile signal emitter vehicles will drive to eleven different sites on the Olympic Peninsula 260 days per year & stay there from 8-16 hours per*

*day involving 1,558 jet flyovers of an average time in air of 100 minutes each for Electronic Warfare activities and Air Combat Maneuvers!!! And what about the people, wildlife & environment?*

*\*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.*

*\*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.*

*\*\*We live in an area surrounded by water and mountains where sound travels further and the noise generated is amplified, which is not considered in the EIS.*



<http://hyperphysics.phy-astr.gsu.edu/hbase/Sound/refrac.html#c2>

.... That's why sound travels further over water: less is lost up into the air, meaning more of it ends up in your ears — or your neighbors. Seder; Physics

DEIS: Noise Conclusion, Alternatives 1 through 3:



**The Proposed Action and alternatives would have a significant impact on the noise environment as it relates to aircraft operations at Ault Field and OLF Coupeville. The number of persons exposed to noise levels 65 dB and above would increase under all alternatives and scenarios.**

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.

EIS: Table 45. Proposed annual training missions for EA-18G jets over the Olympic Military Operations Areas

#### **Name/Identifier**

# Aircraft Flights / Year 1558 entry exit

Avg time in air 100 min. power setting 80 % speed 265

Specific locations for the 11 sites on Forest Service lands are provided in Table 6 and shown in Figure 1. Each site consists of an existing pull-outs or turnarounds which have already been cleared or have natural features (e.g., a cliff or ridgeline) that provide an unobstructed line of sight to the west. The MEWTS will not be parked at training sites overnight, but travel to sites each day from Naval Station Everett Annex Pacific Beach using existing roads. Once on sites, MEWTS will operate between 8 and 16 hours each day for 260 days each year (Navy 2014). Emitters are expected to be energized, emitting signals at 90-300 watts, about 45 minutes of every hour that the MEWTS are on sites (Mosher, pers. comm. 2015; Navy 2014). 7/16 nwt fish & wildlife

#### **6.3 Olympic Military Operations Areas Subunit**

The Olympic MOAs Subunit includes the Pacific Northwest EW Range located on Navy, Forest Service, and Washington State Department of Natural Resources lands in the Olympic Peninsula (Figure 2). Activities include the use of mobile signal emitter vehicles at designated sites located along existing logging roads on Forest Service lands within the Olympic MOA. There will also be overflights for Electronic Warfare activities and Air Combat Maneuvers. 7/16 nwt f&w

Marbled murrelets will not be exposed to high amplitude aircraft sounds by every aircraft flight, but only those where the aircraft are sufficiently close to habitat. Without knowing the location and flight pattern of each training flight, we assumed that the training flights will be evenly distributed throughout the Olympic MOAs. We also assumed that the proportion of the time that aircraft will disturb habitat is equal to the proportion of the training area that is habitat. 7/16 nwt f&w

*\*\*So... the 2016 DEIS statement about avoiding noise sensitive & wilderness areas cannot not be really true. The navy does not need to avoid these areas because the "exceptions" listed describe the entire flight; i.e. "when in compliance an approved traffic or approach pattern, military training route, or within Special Use Airspace."*

*\*\*So...another way to say this is that marbled murrelets **WILL BE EXPOSED** to high amplitude aircraft sounds where the aircraft are close to habitat!!! I object to the navy's circle of words & assumptions used to downplay their impact on endangered species. There will be 1,558 flights per year in the Olympics at an average of 100 minutes each at a power setting of 80% traveling 265 mph. This is a huge impact to endangered species! Eleven military mobile signal emitter vehicles will drive to eleven different sites on the Olympic Peninsula 260 days per year & stay there from 8-16 hours per day involving 1,558 jet flyovers of an average time in air of 100 minutes each for Electronic Warfare activities and Air Combat Maneuvers!*

*\*\*And what about the people, wildlife & environment?*

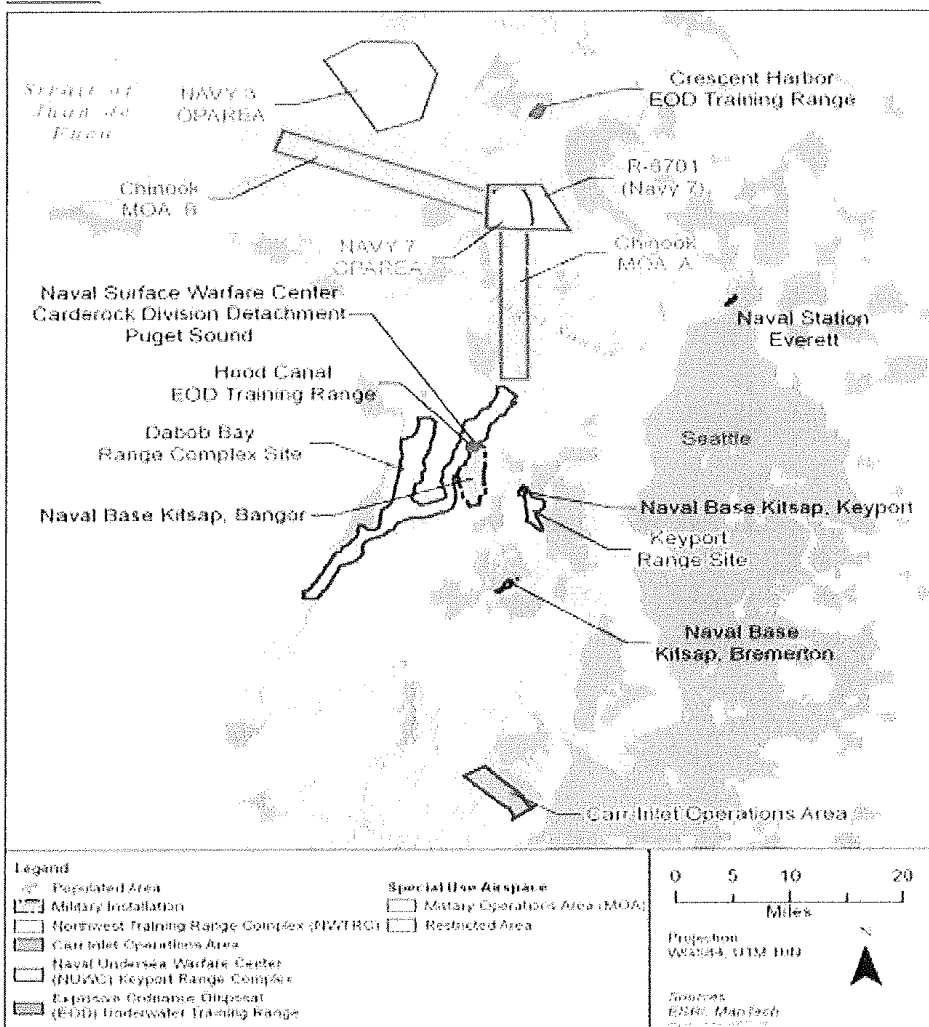


Figure 3. Northwest Training and Testing Inland Waters Areas. These areas are part of the Inland Waters Subunit, and include Puget Sound, Hood Canal, and the Strait of Juan de Fuca.

### 6.2.1 Air Space

Restricted Area 6701 (R-6701, Admiralty Bay) is a restricted area over Admiralty Bay, Washington, with a lower limit at the ocean surface and an upper limit of 5,000 ft MSL. This

airspace covers a total area of 56 nm<sup>2</sup>. Chinook A and B MOAs are 56 nm<sup>2</sup> of airspace south and west of Admiralty Bay. The Chinook MOAs extend from 300 ft to 5,000 ft MSL. The sea and undersea area below R-6701 is categorized as Navy 7 (Figure 3).

---

#### NUMBER OF FLIGHTS & NOISE

Existing Growler aircraft that are transiting from Ault Field's Class C controlled airspace to nearby military training areas (Olympic, Okanogan, Roosevelt, and NWSF Boardman) fly at altitudes between 14,000 feet and 16,000 feet above mean sea level (MSL).

Growler aircraft operating at these transit altitudes would create a sound exposure level (SEL) at ground level between 69 and 84 decibels (dB) and an Lmax of 54 to 72 dB, comparable to the sound level of a passing automobile.

*\*\*This statement in the DEIS says that above 14,000 feet the noise level is 69-84 db. Anything LESS than an altitude of 14,000 feet would create MORE than "69 to 84 decibels". According to another map from Figure 3.1-2, and another statement in the EIS, the Growlers are flying at much lower altitudes to the Olympics, "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."*

*\*Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed.*

*\*Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or*

*1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets.*

EIS: Noise metrics are outlined in Section 3.2. The public would hear noise from aircraft overflights if they are in the vicinity of an event. However, these effects would occur on a temporary and intermittent basis. All flight activity within 10 miles of the NAS Whidbey Island complex is analyzed in more detail in Section 4.2.

There is a net increase of 35 Growler aircraft; total annual airfield operations for the NAS Whidbey Island complex would increase to approximately 130,000, a 47-percent increase.

During an average year, total airfield operations at Ault Field would result in an increase of 12,300 projected operations under Scenario A, when 20 percent of all FCLPs would be conducted at Ault Field, to an increase of 38,700 projected operations under Scenario C, when 80 percent of all FCLPs would be conducted at Ault Field (Table 4.1-2)

*\*\*(130,000 divided by 365 days = 356 per day divided by 24 hours = 14.8 flights per hour)*

*\*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-CEO-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.*

DEIS: The noise levels analyzed and described within this study are from computer- modeled noise and not actual noise measurements at Ault Field or OLF Coupeville. As discussed in Section 3.2.2, computer modeling provides a tool to assess potential noise impacts.

The national average of time spent indoors is approximately 87 percent (or almost 21 hours of the day) (Klepeis et al., n.d.). With intermittent aircraft operations and the time most people spend indoors, it is very unlikely that individuals would experience noise exposure that would result in hearing loss.

Day-Night Average Sound Level (DNL) noise contours are generated by a computer model that draws from a library of actual aircraft noise measurements. Noise contours produced by the model allow a comparison of existing conditions and proposed changes or alternative actions that do not currently exist or operate at the installation. For these reasons, on-site noise monitoring is seldom used at military air installations, especially when the aircraft mix and operational tempo are not uniform

DNL represents noise exposure events over a 24-hour period.

It is the areas within the 65, 70, and 75 DNL noise contours that the FAA considers to be the most impacted by aircraft generated noise. Beyond the 65 DNL noise contour, noise is most noticeable in areas below established flight corridors. You can view the latest noise contour map at <http://www.broward.org/images/airport/noisemonitorlocations.jpg>.

(server couldn't find this http site)

*\*\*Where are these established flight corridors? Recorded flyover sound at our home duration is over 2 minutes. We are "the public that would hear noise from aircraft overflights in the vicinity of an event." What is an "event"??? We hear jets continuously throughout the day; the continuous take off's & landings and the continuous flyovers. We do not "fit" into any of your noise models, or your national average of time spent indoors/outdoors, & our ears & bodies don't average noise into according to your DNL model.*

*\*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.*

*\* Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public.*

*\* The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers.*

*\* The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible. (<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>)*

*\*The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them.*

## **NOISE**

By air, land, & sea we are facing an onslaught of noise that threatens to make our world unlivable. As a society we have chosen to make a tradeoff. We've been willing to tolerate a certain amount of noise for the sake of having what we see as benefits: things like motorized travel, labor-saving machines, and amplified sound at community events. We have essentially granted ourselves the right to make noise. But along with rights, as is so often said, come responsibilities. Have we developed a sense of acoustic responsibility in our society? The evidence suggests that we have not. It's widely accepted that we have responsibility for our garbage. Drop a candy wrapper on the ground and you are potentially liable to a stiff fine. Noise is garbage, and it is a particularly insidious form of garbage. It destroys community life, pursues us into our homes, keeps us from sleeping, and is a cause of many stress-related illnesses as well as hearing loss. The current destruction of silence in our world is an environmental catastrophe. The soundscape, our acoustic



environment, has been described as a "commons" -- something that belongs to all of us. Everyone has the right to use it, but no one has the right to abuse it. Let's start using it responsibly. Acoustic Responsibility: A Concept Whose Time Has Come by Peter Donnelly August 1997

*\*Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable." (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).*

#### 4. CHAFF

*\*\*I attended the Navy's Open House meeting in Port Townsend on Dec. 16, 2016. I am concerned about the navy's use of it in chaff being released into our air, land, & water. I asked several navy representatives about the navy's practice of releasing chaff and also the navy's practice of dumping fuel. One flight officer said he releases chaff during flights "at times" in the Olympic Peninsula area. Another officer told me that the navy only uses it at the Idaho location, and he has released it there. Another officer referred me to Laurie Kutina, who*

*was representing the Air Pollution display. I wrote down exactly what L.K. said to me at that time; "...never heard of the navy releasing chaff" & "...fuel dumping is not done on a regular basis".*

**\*\*Laurie Kutina should know what she is talking about as she was listed as a reference in the NAS Whidbey Island Complex Growler DEIS, Volume 1 November 2016** Laurie S. Kutina, CEM, REM, *Air Quality Specialist*, B.S. Physics, M.A. Architecture, M.A. Business Administration

NORTHWEST TRAINING RANGE COMPLEX EIS/OEIS 2010:

### **3.3.2.2.10 Aviation Fuel and Other Propellants**

Under the No Action Alternative, a total of 7,586 sorties would be flown by fixed-wing aircraft, helicopters, and unmanned aerial vehicles (Table 3.3-23).

#### **Table 3.3-23: Aircraft Sorties per Year – No Action Alternative**

Issues associated with aviation fuel arise with the need to jettison fuel from a manned aircraft or with the loss of an unmanned aircraft. Both situations are infrequent and occur only in emergency situations. Aircraft with offshore in-flight emergencies that require the craft to weigh less will jettison stores, not fuel. Aircraft operating from an aircraft carrier that experience in-flight emergencies prefer to divert to a land-based airfield rather than a carrier landing. Fuel that is jettisoned is discarded above 8,000 feet (2,500 m) over water west of Naval Air Station Whidbey Island just prior to landing. At that elevation, the fuel dissipates in the air before any liquid reaches the ground. Given the small number of such incidents and the wide area across which they might occur, neither issue would have more than a negligible impact on the environment.

**\*\*Here is what I found about chaff from the NWTT 7/16.... that chaff is used for air combat maneuvers & electronic warfare in 110 "events" per year with 2 to 4 aircraft per event, above land & water. This usage of chaff is a documented to be of great concern in the environment, which is not noted on this current DEIS.**

Air	_____	No No <b>Chaff</b> , Conducted 95 percent daytime, 5 percent
Comb	Offshore 550	ne ne flares nighttime.
at	Area	
Mane		Typically 2 but up to 4 aircraft per event. 110
uver	(Warning	events per year use chaff/flares. For flights over
	Area 237	land in the Olympic MOAs, the minimum flight
	[W-237]),	altitude is typically greater than 4,000 ft above
	Olympic	ground level for 90 percent of the airspace.
	MOA	When flying in the MOAs, Navy aircraft do not
		fly at the outer edges of the MOAs, to <b>prevent</b>
		<b>spilling out of the airspace</b> . Navy aircraft will
		not be lower than 2000 ft above ground level.
		Seventy percent of all Navy flights in the MOAs
		are above 20,000 ft and 95 percent of all flights
		are above 10,000 ft.

Electronic	Flare	Offshore	1(No No Flares, Test conducted year-round, day and night,
Warfare	Test	e Area	ne ne <b>chaff</b> greater than 3 nm from shore.

48 WHEREAS each cylinder contains millions of heavy metal-coated glass fibers called

49 “Chaff”; chaff is small enough to be inhaled or swallowed and is dangerous to human

50 health – a 72% increase in chaff release is expected according to the NWTTS EIS; san juan county democrats 9/16

Current DOD Chaff Use Policy and Initiatives:

Currently, DOD severely restricts the use of chaff in training in order to reduce pollution of the environment and to protect civilian airspace. At the height of the Cold War, training with RF chaff was permissible at all military training ranges and MOAs within the United States. Since 1990, the DOD has attempted to balance the chaff training needs of the Armed Services with concerns of the public and government for the possible negative impacts of chaff use on the environment. In 1998, the Joint Chiefs of Staff issued a directive incorporating chaff use policies of each of the Armed Forces and placed significant restrictions on the use of chaff for training in the United States (CJCSM, 1998). As a result, the number of training sites where chaff training is permitted has been reduced to approximately 50 selected ranges and MOAs in and around the US (see Fig. 2). Additionally, flight rules were changed and now stipulate that chaff should not be released below certain altitudes during training to ensure chaff plumes are widely dispersed and dipole ground level concentrations are very low. Likewise, DOD policy for chaff operations requires that every effort be made to conduct chaff drops away from major air routes and air route hubs and to avoid frequent dispersal over the same ground points. DOD policy also specifies that all planned chaff releases and training flight plans be reported to the Federal Aviation Administration and local environmental agencies. <http://www.globalresearch.ca/chemtrails-the-consequences-of-toxic-metals-and-chemical-aerosols-on-human-health/19047>

What happens to aluminum when it enters the environment?

- 1 Aluminum cannot be destroyed in the environment, it can only change its form.
- 2 In the air, aluminum binds to small particles, which can stay suspended for many days.
- 3 Under most conditions, a small amount of aluminum will dissolve in lakes, streams, and rivers.
- 4 It can be taken up by some plants from soil.

<http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=190&tid=34> 6/2/2012

Though it was impossible to know where the whales had been, Payne said the contamination was embedded in the blubber of males formed in the frigid polar regions, indicating that the animals had ingested the metals far from where they were emitted.

"When you're working with a synthetic chemical which never existed in nature before and you find it in a whale which came from the Arctic or Antarctic, it tells you that was made by people and it got into the whale," he said.

How that happened is unclear, but the contaminants likely were carried by wind or ocean currents, or were eaten by the sperm whales' prey.

Chromium, an industrial pollutant that causes cancer in humans, was found in all but two of the 361 sperm whale samples that were tested for it. Those findings were published last year in the scientific journal *Chemosphere*.

"The biggest surprise was chromium," Payne said. "That's an absolute shocker. Nobody was even looking for it."

The corrosion-resistant metal is used in stainless steel, paints, dyes and the tanning of leather. It can cause lung cancer in people who work in industries where it is commonly used, and was the focus of the California environmental lawsuit that gained fame in the movie "Erin Brockovich."

Wise found that the concentration of chromium found in whales was several times higher than the level required to kill healthy cells in a Petri dish, Payne said.

He said another surprise was the high concentrations of aluminum.

The consequences of the metals could be horrific for both whale and man, he said.

"I don't see any future for whale species except extinction," Payne said. "This is not on anybody's radar, no government's radar anywhere, and I think it should be."

[http://news.yahoo.com/s/ap/20100624/ap\\_on\\_sc/whaling/print;\\_ylt=AgQjH\\_F44OC.Kyn1...](http://news.yahoo.com/s/ap/20100624/ap_on_sc/whaling/print;_ylt=AgQjH_F44OC.Kyn1...) 6/25/2010

Print Story: Report: Toxins found in whales bode ill for humans

STATE OF CALIFORNIA  
ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT SAFE  
DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986

CHEMICALS KNOWN TO THE STATE TO CAUSE CANCER OR  
REPRODUCTIVE TOXICITY FEBRUARY 17, 2012: CHROMIUM.

The report addresses the potential biological effects of chaff on wildlife due to inhalation, ingestion, and direct contact as well as the effects of **chaff** on vegetation and aquatic life of chaff decomposing in soil or water. The Air Force reported no adverse impacts from chaff and said that chaff is generally nontoxic. However, few studies of the effects of chaff on wildlife have been conducted, and the report found no data on chaff's decomposition process under different environmental conditions (arid, alkaline, wet, acidic) or inside the digestive systems of animals. The study includes a literature review, field studies, and laboratory analyses of soil samples taken at Nellis and Townsend, the two military range areas studied. The report cites a 1972 Canada Department of Agriculture study that found no health hazards to farm animals. The Air Force study also cited

a previous report on the Chesapeake Bay ecosystem that found no impacts on the six marine organisms studied.<sup>7</sup>

The Air Force study reports the following:

Animals can inhale chaff particles, but the particles do not penetrate far into the respiratory system and can be easily cleared out. Chaff disperses over large areas of land, limiting exposure of grazing animals. Little chaff accumulated on the surface of standing water bodies. Surface-feeding & bottom-feeding animals and fish may ingest chaff, but this only affects a few individual animals and has a low impact on species populations except in the case of protected species. Chaff disintegrates on land. It decomposes slowly in arid area and has no adverse effects on soil chemistry and plant growth. Chaff interference with wildlife is expected to be negligible based on chaff use, characteristics, and observed accumulations. Chaff decomposing in water has no adverse impacts on water chemistry and aquatic life. In wet areas, chaff is covered by plant growth and dead leaves. Chaff decomposes more rapidly in wet acidic environments, but when doing so it releases only minute amounts of chemicals. <http://www.fas.org/man/gao/nsiad-98-219.htm> 5/31/2009

The following article by the late Dr. Ilya Perlingueri was first published by Global Research in May 2010:

For decades, we have known that heavy metals and chemicals can cause grave physical harm. Going back to Rachel Carson's "Silent Spring," we have known and been amply warned of the serious consequences of using or being exposed to these poisons in our daily activities. Thousands of these are well-documented carcinogens.

Aluminum has a history of damaging brain function. Independent researchers and labs continue to show off-the-scale levels of these poisons. A few "anonymous" officials have acknowledged this on-going aerosol spraying.<sup>(5)</sup> Numerous tests have been done to verify that these poisons are off the scale in their toxicity. They are documented in our water, in our soil, and in our air. For more than 10 years, researcher Clifford Carnicom has been valiantly and systematically reporting on the various detrimental aspects of these aerosols –and what they are doing to our entire environment, as well as our blood.<sup>(6)</sup> Various "sky watch" groups also have been carefully documenting and diligently reporting about these daily assaults.<sup>(7)</sup> With all these poisons surrounding our every breath, it is not surprising

to see a dramatic increase in illnesses. There are numerous reports of the increase in cardiac deaths and upper respiratory illnesses (asthma, chronic bronchitis, lung cancer, and often multiple chronic illnesses). Chemtrails toxicity has already dramatically affected our deteriorating "collective health." The significant increasing heart disease and various upper respiratory illnesses has been linked to a vast increase in "particulate matter" in our air.

Dr. Kilburn's research clearly shows that chemicals do affect and seriously harm the brain [and, thereby, cognitive function]. Chemicals—especially a daily onslaught of toxic chemicals over many years—can damage our ability to think clearly. Even if we find this hard to believe, the evidence is there. Dr. Kilburn has expanded this essay into the first book to research this: "Chemical Brain Injury" (published in 1998). Dr. Kilburn notes: The brain's preservation represents the only possibility of survival for mankind. To find in many parts of the country and in many individual patients that its function is eroded seriously by chemicals, chemicals that have been introduced into the environment basically in the last 50 years, is bad news indeed. [www.neuro-test.com/aboutKilburn/aboutKilburn.html](http://www.neuro-test.com/aboutKilburn/aboutKilburn.html)

Wilderness Watch 1/14/17

The DDN and EA Inadequately Analyze Impacts to Wilderness in Violation of the National Environmental Policy Act and the Wilderness Act

The EA does not discuss the impacts of this proposal on the Olympic Wilderness (Olympic National Park), the Colonel Bob Wilderness, Washington Islands Wilderness, the Lake Chelan-Sawtooth Wilderness or the Pasayten Wilderness. All five of these Wildernesses are within, or partially within, the MOAs outlined in the EA (see figures 1.3-1 and 1.3-2).

Furthermore, the EA does not analyze whether flight paths would go outside of the MOAs. Given the location of the bases, the flights would have to go outside the MOAs. Thus, additional Wildernesses would likely be affected. The Stephen Mather, Glacier Peak, Mount Baker, Noisy Diobsud, Boulder River, Henry M Jackson, Wild Sky, Alpine Lakes and San Juan Islands Wildernesses could be affected.



The EA only says this about the topic:

Noise-sensitive areas are those areas where noise interferes with normal activities associated with its use. Normally, noise-sensitive areas include residential, educational, health, religious structures and sites, parks, recreational areas (including areas with wilderness characteristics), wildlife refuges, and cultural and historical sites. In the context of facilities and equipment, noise-sensitive areas may include such sites in the immediate vicinity of operations, pursuant to the Noise Control Act of 1972. Users of designated recreational areas are considered sensitive receptors.

There is no site-specific analysis of noise or any other impacts, either from the planes and how they may operate differently for this project, or from the emitters, some of which would be stationed near Wilderness. The only mention is of recreation areas which may have wilderness characteristics. Even if this is an erroneous conflation of recreational areas with Wilderness, it is not an analysis the impacts to Wilderness or wilderness character. Indeed, the Wildernesses affected in the MOAs are not even mentioned by name. The EA contains no analysis of Wilderness. Thus, the EA fails to comply with the Wilderness Act and NEPA. The wilderness analysis (including impacts to wilderness character) in the EA is not even an afterthought. The word wilderness is only mentioned 3 times in the EA: 1) page 3.2-13, the Salmon Priest Wilderness which is in northeastern Washington in context of caribou, 2) page 3.3- 3 in context of areas with wilderness characteristics (see our comment quoted above), and 3) wilderness protection plans in context of a coalition in northeastern Washington. Nowhere is it recognized the Colonel Bob Wilderness is within the MOA. The document is inadequate. Not only is that a serious omission in terms of the National Environmental Policy Act (NEPA) analysis, the EA and DDN fail to recognize the Forest Service's duty to protect Wilderness. The first sentence of Section 2(a) of the 1964 Act describes the purpose of the Act:

In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this purpose there is hereby established a National Wilderness Preservation System to be

composed of federally owned areas designated by Congress as "wilderness areas", and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness; and no Federal lands shall be designated as "wilderness areas" except as provided for in this Act or by a subsequent Act.

In brief that purpose is to keep some areas unoccupied and unmodified. And this protection is for present and future generations--for all time--in perpetuity.

Congress identified a new resource--the resource of wilderness.

Further Congress defined wilderness in section 2(c) as a place "in contrast" to areas where humans and their works dominate, "where the earth and community of life are untrammelled by man, where man himself is a visitor who does not remain."

Thus, there is a clear intention that Wilderness must remain in contrast to modern civilization, its technologies, conventions, and contrivances. Indeed, there is the mandate to preserve wilderness in perpetuity.

In response to our comments, there is simply the contention that the Navy in the EA determined that it would have no impact on small wilderness. On the face of it, such a conclusion is absurd, given the fact the EA does not specifically analyze the Colonel Bob Wilderness (or other wildernesses within other MOAs). In any case, military jets flying at low elevations have a tremendous impact on the Wilderness and those in it. There are two key points the EA and DDN fail to address:

- The Navy has no authority over or expertise in wilderness administration or wilderness stewardship. The deference given to this conclusion in the Forest Service's DDN suggests that agency had littler no involvement in preparation of the EA.
- Even if the Forest Service was fully consulted and made the erroneous and unsupported findings in the EA, the Forest Service knows full well that artificial sounds have an impact on wilderness character. The Forest Service's own document, Keeping It Wild 2: An Updated Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System (Landres et al.

2015, see Attachment 1) has an indicator of Remoteness from sights and sounds of human activity outside the wilderness. Also, wilderness.net, the website for agency wilderness professionals has extensive documentation on the impact of sound on Wilderness <http://www.wilderness.net/sound/> There is a long history of the importance of natural soundscapes in Wilderness documented in the Attachment 1 and on the wilderness.net website. There is also case law requiring the Forest Service to evaluate the impact on Wilderness of a snowmobile trail on the border of the Boundary Waters Canoe Area Wilderness.

## 5. ELECTROMAGNETIC 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.”*

*\*\*War games would also test new electromagnetic weaponry, triggering significant concerns about the potential health impacts and migratory patterns of birds, amphibians and sea creatures, as well as plants, micro-fauna and human*

*beings. Several indigenous tribes call these lands home. A quick search on Google Scholar for "Electromagnetic fields risk to humans" produces over 63,000 results, most of which are published scientific studies that chronicle the deleterious impact of electromagnetic fields. Health experts reported to be associated with ELF and/or RF include childhood leukemia, brain tumors, genotoxic effects, neurological effects and neurodegenerative diseases, immune system deregulation, allergic and inflammatory responses, breast cancer, miscarriage and some cardiovascular effects. The BioInitiative Report concluded that a reasonable suspicion of risk exists based on clear evidence of bioeffects at environmentally relevant levels, which, with prolonged exposures may reasonably be presumed to result in health impacts. Electromagnetic radiation's impact on wildlife is very well documented, as thousands of peer-reviewed scientific studies.*

Table 5. Summary of mobile electromagnetic emitters in electronic warfare training.

Emitter type	Range of Electromagnetic (EM) wave frequencies (Gigahertz [GHz])	Shape of EM signal	Dimensions of EM Signal	Radiation Hazard Minimum Safe Separation Distance
Traveling Wave Tube Amplifier	4-8	.. Cone	8.1 degrees	30.8 m / 101.1 ft

	6.7 – 7.4	Wedge 9 degrees	
Magnetron		horizontal	8.9 m / 29.3 ft
		1	
		27	
		degrees	
		vertical	

o

(Mosher, pers. comm. 2015; Navy 2014)

Electromagnetic Radiation B. Blake Levitt. Former New York Times journalist and author of *Electromagnetic Fields, A Consumer's Guide to the Issues and How to Protect Ourselves: Ambient man-made electromagnetic fields (EMFs), across a range of frequencies, are a serious environmental issue. Yet most environmentalists know little about it, perhaps because the subject has been the purview of physicists and engineers for so long that biologists have lost touch with electromagnetism's fundamental inclusion in the biological paradigm. All living cells and indeed whole living beings, no matter what genus or species, are dynamic coherent electrical systems utterly reliant on bioelectricity for life's most basic metabolic processes. It turns out that most living things are fantastically sensitive to vanishingly small EMF exposures. Living cells interpret such exposures as part of our normal cellular activities (think heartbeats, brainwaves, cell division itself, etc.) The problem is, man-made electromagnetic exposures aren't "normal." They are artificial artifacts, with unusual intensities, signaling characteristics, pulsing patterns, and wave forms, that don't exist in nature. And they can misdirect cells in myriad ways. Every aspect of the ecosystem may be affected, including all living species from animals, humans, plants and even microorganisms in water and soil. We are already seeing problems in sentinel species like birds, bats, and bees. Wildlife is known to abandon areas when cell towers are placed. Radiofrequency radiation (RF)—the part of the electromagnetic spectrum used in all-things-wireless today—is a known immune system suppressor, among other things. RF is a form of energetic air pollution and we need to understand it as such. Humans are not the only species being affected. The health of our planet may be in jeopardy from this newest environmental concern—added to all the others. Citizens need to call upon government to fund appropriate research and to get industry influence out of the dialogue. We ignore this at our own peril now."*

Dr. Martin Pall

However the last quote sends us to Section 3.0.5.3.2.1 which has in it a section entitled “Airborne Electromagnetic Energy” which states “Sources of airborne electromagnetic energy include aircraft on shipboard radar and communications equipment and aircraft jamming systems. All of these systems are operated within Federal Communication Commission-approved frequency ranges designed to eliminate interference issues with common electronic systems used by the public. These systems are also operated at power levels, altitudes and distances from people and animals to ensure that energy received is well below levels that could disrupt behavior or cause injury.” It is not clear here whether they are referring to the electronic warfare that is the central issue with this EIS, or not. But what is clear in the last quoted statement, is that they are assuming here that only energy received (in other words heating effects) need be considered – something that the Navy knew to be false 44 years ago.

**This is the sum total that is provided in the EIS that relates in any way to human health effects of the electromagnetic fields to be used for electronic warfare testing and training. It is all based on an almost magical belief that the Navy procedures will protect us from health effects while providing not one iota of information on what those procedures are nor why we should believe that they protect us from health and safety effects. It is all based on the claim that only heating effects need be considered something that over 10,000 published studies plus vast scientific opinion literature shows to be false. It is based, therefore, on a stunning ignorance of the scientific literature, such that it is impossible to find anything in these parts of the EIS that give us any confidence whatsoever in their claims.**

Certainly, mammals of various sorts are likely to be affected by these EMFs much like humans. But the VGCCs occur universally or almost universally among animals including invertebrates and protozoa. Somewhat surprisingly, plants also have calcium channels in their plasma membranes that are activated by EMF exposures. Although they differ from the animal channels in important ways, they have a very similar voltage sensor to that found on the animal voltage sensor and

these appear to be the main target in plants of these EMFs (see, for example Plant, Cell and Environment 2007; 30:834-844). It follows from this that there are likely to be major effects on plants in both the National Forest and National Park if the Navy gets its way. There are publications suggesting that migrating birds, amphibia and bees are apparently particularly sensitive to such EMF exposures. Migrating birds have apparently an additional target of EMFs, small magnetic particles which help the birds migrate in accordance with the earth's magnetic field so it is likely that the Navy's claims that birds are not likely to be affected is probably bogus. In humans, one of the common neuropsychiatric consequences of EMF exposures (see ref 2 in paper copied below) is what is called dysesthesia, disruption of sensory function including visual, acoustic and olfactory function. So birds, including eagles which depend on an extremely keen visual perception, may well be visually affected by the Navy EMFs, quite possibly putting the Navy in violation of the Bald and Golden Eagle Protection Act (discussed on p. 3.0-2 or the EIS). There has been published evidence from Balmori's laboratory, showing the amphibia are very sensitive to these EMFs and it has been suggested that the widespread effects of artificial EMFs may contribute to the world wide, unexplained amphibian decline. In any case, it would be a mistake to assume no effects Navy's electronic warfare EMFs on amphibian populations without experimental studies testing whether this is true or not. This brings us to another point. In this entire EIS, the Navy has produced not a single study of biological impacts of the EMFs it plans to unleash on the people, animals and plants of the Olympic peninsula. Their entire argument for safety is based on a theory that only thermal effects need be considered, a theory that the Navy itself knew to be bogus 44 years ago and is still widely known in the scientific community to be bogus. This alone should be more than sufficient to throw out this entire EIS!

In summary, then, regarding human, animal or plant effects of the EMFs it plans to use for electronic warfare:

The Navy today is at least 2000 times less knowledgeable than the Navy was 44 years ago in 1971; the Navy today is also at least 10,000 times less knowledgeable today than it should be. The Navy provides not a single experimental study on biological effects of the EMFs it plans to use in the Olympic Peninsula. It provides, therefore not an iota of biological evidence to support any of its claims. It provides not even a single citation to the scientific literature to support its claims. The Navy claims are based entirely on the position that only thermal effects need be considered, a position that the Navy knew to be false 44 years ago and a position contradicted by many thousands of published scientific studies. That position is also contradicted by widespread scientific opinion expressed continuously over the past 44 years. Low-intensity microwave frequency EMFs have been shown to produce the following effects in humans and other mammals via non-thermal mechanisms: Oxidative stress; genotoxicity including single and double strand breaks in cellular DNA as well as 8-hydroxyguanine residues in cellular DNA; these are thought, in turn to cause cancer when they occur in the somatic cells of the body; these are thought to also cause germ line mutations when they occur in germ cells, producing in turn deleterious mutations in future generations; male and female infertility; massive damage to the nervous system which in the brain produce widespread neuropsychiatric effects – such widespread neuropsychiatric effects were known to the Navy as shown in its 1971 report; breakdown of the blood brain barrier; cardiac effects including tachycardia and also bradycardia associated with arrhythmias and arrhythmias are known to often lead to sudden cardiac death – such cardiac effects were already known to the Navy as shown by its 1971 report; melatonin depletion and insomnia. The Navy provides not one iota of evidence to show that each of these effects will not be caused by the electronic warfare EMFs in the civilian population of the Olympic Peninsula. It is also of great concern that similar effects may well occur in the pilots of the F18 planes involved. It can be seen from 5 above,



that low intensity EMFs attack each of the 4 things we most value as individuals and as a species: Our health, our brain function, the integrity of our genomes and our ability to produce healthy offspring. The EIS provides not one iota of evidence that these 4 things will not be produced in civilians of the Olympic Peninsula and in the F18 pilots by the electronic warfare EMFs. Each of the biological effects listed in 5 and 6 above, can be produced by what are called “downstream effects” of VGCC activation, the predominant mechanism of action of low-intensity EMFs in the cells of our bodies. None of this is considered in the EIS. The voltage sensor of the VGCCs appears to be extraordinarily sensitive to low intensity EMFs based on its physical structure and position in the plasma membrane of our cells. These physical properties, based simply on physics, predict that the forces placed on the voltage sensor by EMFs are about 7.2 million times higher than the forces places on single charged groups found elsewhere in the cell. This argues, therefore, that the acceptable levels of exposure of safety standards/guidelines based only on thermal effects, are about 7.2 million time too high and that much lower levels of exposure can cause major biological effects. This entire area of science is completely ignored by the EIS. The biological effects produced in 7 and 8 above are important and widespread in many animals and also in plants. Certain species, including birds (especially migrating birds and eagles), amphibia, bees, sharks and salmon may be particularly susceptible. It seems likely that still additional especially susceptible species may be discovered as such studies progress further. There is, therefore, ample reason for great concern about the animals and plants in and around the Olympic Peninsula.

In summary, each of the 9 major flaws in the part of the EIS on biological effects of EMFs are individually sufficient, in my view, to reject the entire EIS and being fatally flawed.

Martin L. Pall, Professor Emeritus of Biochemistry and Basic Medical Sciences  
Washington State University

## 6. GROUNDWATER

*\*\*I have been a vendor at the Coupeville Farmers Market for several years. I am wondering how we can continue to have a viable farmers market as more of the community becomes aware of the pollutants contaminating the groundwater and soil that grows our food.*

*\*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.*

*\*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/spur/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>)*

*\*No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? 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.*

## 7. CONCLUSION

*\*\*The Navy needs to know that they have a significant & serious impact in Northwest Washington where I have lived my entire life; raised my 3 children, am a public school teacher and a commercial fisherman, and am shocked by the disruption & destruction that the navy has brought to this area.*

*It doesn't make any sense to PRACTICE strategies to PROTECT potential outside threats to national security, while at the same time DESTROYING the health & well being of all living things within this area.*

*Many vital points are summarized in the following lines submitted by the San Juan County Democrats:*

Impacts of Navy Expansion and Training 2 in Northwestern Washington State

3

Submitted by the San Juan County Democrats. (Date Submitted 9/2/2016)

1. 4 **WHEREAS** Northwest Washington, is home to pristine natural environments
2. 5 including: marine protected areas, National Monuments, Parks, Forests, and Wildlife
3. 6 Refuges, State Parks, the Olympic Coast National Marine Sanctuary, the Olympic
4. 7 Mountains, and the Cascade Mountains;
5. 9 **WHEREAS** Northwest Washington's natural environment and wildlife provide
6. 10 immeasurable public benefits through sustainable economic and public health activity,
7. 11 including: agriculture, outdoor recreation options, and tourism (3 million to the
8. 12 Olympic National Park, 1 million to San Juan County), and are home to many
9. 13 communities and residents who value and rely upon the character of their regional
10. 14 environment for work, health, or both; and
11. 16 **WHEREAS** the U.S. Navy, based in several locations in Northwest Washington, has
12. 17 initiated a significant multi-regional expansion of training and testing schedules and
13. 18 locations, routines, and technologies, including:

Use of the western portion of the Olympic Peninsula and surrounding waters to simulate an Electromagnetic Warfare Range, flying 260 days per year, 8-16 hours per day, up to 153 jets, capable of 150 decibels each;  
 Combat training on 68+ beaches in Puget Sound, the Strait of Juan de Fuca and Pacific Ocean beaches in Washington, unannounced and undisclosed to the public and to state, local and federal agencies;

Increased range and frequency of EA-18G Growler jet training flights throughout Northwest Washington including: from OLF Coupeville and Ault Field on Whidbey Island, over San Juan County, Jefferson County, Clallam County, Skagit County, the North Cascades, the Olympic Mountains, LaConner, Port Townsend, Sequim, Port Angeles, Forks and several Indian Reservations, regularly measuring noise levels that exceed thresholds for permanent hearing damage, often between 75 and 108 decibels inside their homes;

38 **WHEREAS** the Navy estimates 1.2 million marine mammal takes (killed or harmed) as

14. 39 a result of Navy activities over a period of five years;

15. 41 **WHEREAS** the current level of jet noise has been medically documented to seriously

16. 42 impact health and quality of life of many residents in Northwest Washington;

Unprecedented expansion of sonar and explosive activities in the Strait of Juan de Fuca, the waters off Indian Island, Puget Sound, and the Olympic Coast National Marine Sanctuary, consisting of 2,408 square nautical miles of Olympic Peninsula coastline, in which the mid-frequency sonar systems the Navy employs are capable of generating sounds in excess of 235 decibels;

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43

1. 44 **WHEREAS** the current level of jet noise has affected real estate sales in San Juan

2. 45 County and Island County, forcing local realtors on Whidbey Island and San Juan

3. 46 County to add a military jet noise disclosure clause to property sales; and

47

1. 48 **WHEREAS** each cylinder contains millions of heavy metal-coated glass fibers called

2. 49 “Chaff”; chaff is small enough to be inhaled or swallowed and is dangerous to human

3. 50 health – a 72% increase in chaff release is expected according to the NWTT EIS;

51

1. 52 **WHEREAS** the increase in military jet noise over Northwest Washington has been well

2. 53 documented since the first Growlers arrived in 2008; San Juan County residents have

3. 54 entered over 4,800 jet noise complaints on the County jet noise reporting map since May

4. 55 of 2014; and the Navy, having listed many surrounding communities including San

5. 56 Juan County, as areas of “No Significant Impact” from Growler noise, has yet to issue a

6. 57 draft Environmental Impact Statement; and

58

1. 59 **WHEREAS** known environmental and human health impacts from the increase in

2. 60 frequency of training activity, and from testing new defense technology present
3. 61 irreparable harms to the residents, environment, and economy of Northwest
4. 62 Washington, and additional, lesser-known harms have not yet been evaluated through
5. 63 EIS or public experience

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Victoria, British Columbia V8N6C5

I appreciate these are the "sounds of freedom" and that pilots need to practice but the noise/rumbling is getting a bit much on this side of the water. We face San Juan Island and our house vibrates from the noise of the jets. It would be great if the landing strip could be relocated further into Washington State or along the western coast of Washington away from populated areas.



, NJ 07727

I vacation in Olympic National Park and enjoy the quiet pristine natural beauty and abundant wildlife. I am completely against any action that disturbs this wondrous natural habitat.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area



## Public Meeting Comment Form

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

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

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

1. Name [REDACTED]
2. Organization/Affiliation PORT TOWNSEND RESIDENT
3. Address [REDACTED] PORT TOWNSEND, 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

I UNDERSTAND THAT THE E18 NOISE IS NOT A HEALTH CONCERN PER SE. IT IS HOWEVER A LARGE ANNOYANCE DURING EVENING AND NIGHT OPERATIONS. THE FLY OVERS OF PORT TOWNSEND ARE NO WHERE NEAR AS UNCOMFORTABLE AS THE LANDING PRACTICE. THE CONSTANT DRONE OF JET ENGINES IS ENOUGH TO DRIVE US BATTY AND PREVENT SLEEP.

THE NAVY'S PRESENCE ON WHIDBEY IS WELL DOCUMENTED BUT IN THE '40S AND 1950S MOST AIRCRAFT WERE QUIETER. NOISE IN THE MODERN WORLD IS BECOMING AN INCREASING ISSUE.

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

Port Townsend, WA 98368

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

The Cape George retirement community just south of Port Townsend will be negatively impacted by an increase in noisy fighter jets passing overhead. Please direct your military traffic away from quiet rural areas and the historic towns they surround.

Bellingham, WA 98225

As you are aware, another federal entity, the National Park Service, measured sound on the Reserve and the decibels far exceeded your 'average' of 60 decibels. Its accurate measurement of the sound (not a computer generated calculation) of 115 decibels is literally deafening.

- 1.a. Thank You
- 12.n. Quality of Life
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Seattle, WA 98101

we were participating in the annual wa sea otter survey on June 23rd 2016 and were watching a raft of 20 sea otters, over 200 hauled out harbor seals , and many seabirds on the offshore rocks when at about 1 pm there was a very loud sound like a huge explosion followed by jet noise. all teh animals scattered. teh otter dove, the harbor seals threw themsleves in the water and teh seabirds all took off from teh rocks at once. this was increadibly disturbgin to teh marine wildlife off the Wa coast. I assumed it had to have been a navy growler breaking the sound barrier and then flying overhead. The noise these jets make is extremely disturbing to wa wildife and people hoping for a wilderness experience. the numbers of jets flying our skies should decrease not increase!

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

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

[REDACTED]  
[REDACTED], Port Townsend WA 98368  
[REDACTED]

January 15, 2017

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

Dear EA-18G Growler EIS Project Manager:

I object to the incompleteness of the Navy's EIS for expansion of Growlers on Whidbey Island. My most significant objection pertains to the Navy's segmentation of reporting by geography and by type of expansion activity. The combined, cumulative regional environmental impacts are substantially underestimated due to segmentation.

I attended the open house public meeting in Port Townsend on December 5, 2016, and wrote a previous letter on October 31, 2014. Below is a list of my new or more in-depth objections:

1. This Is the Way It Has Always Been
2. Audiology Impacts Not Fully Considered & Tested
3. Segmentation and Cumulative Effects
4. Safety
5. Noise Mitigation Technology
6. Testing of Areas on National Register of Historic Places

Explanations and justification for each item follows.

### **1. THIS IS THE WAY IT HAS ALWAYS BEEN**

I talked with many of the representatives at each of the stations at the public meeting. I individually asked them, "*Why do the Growler operations have to expand on Whidbey Island ... why not elsewhere?*" The reply without exception was, "*This is the way it has always been.*" Some representatives spoke of pride in expanding from a base that has a long history of being successful.

- Such a response is inadequate in the face of growing population, development, environmental concerns on land and in water, safety issues, health effects, tourist considerations, related economic impacts and the quality of life of residents and tourists in the area.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 1.d. General Project Concerns
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 19.b. Revised Cumulative Impacts Analysis
- 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.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.d. Recreation and Wilderness Analysis and Study Area
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

- This consistent reply suggests entrenchment in thinking and is not forward-looking.

The Navy's proposal takes unfair advantage of an area with a lower population, smaller school enrollment and largely uninhabited, fragile eco-system of Olympic National Park compared to suburban and urban regions. It is unacceptable to subject any size population, established parks, coasts, Olympic Coast Marine Life Sanctuary, 113 endangered species and other animals and plants to noise pollution. Noise pollution may negatively impact normative behaviors (feeding, mating, migrating, teaching, communicating, sleeping) and/or cause physiological harm (organ damage, hearing loss, etc.).

Moreover, the Growler EIS does not fully recognize or quantify the *economic impact* of noise on a major tourist destination. Populations swell from spring to fall.

An illustration is Deception Pass State Park, which has 2 million visitors each year. Fort Casey and Admiralty Head Lighthouse draw visitors who patronize lodges, restaurants, and shops throughout Central and North Whidbey. Keystone Under-water State Park attracts divers from all over the world who stay overnight. Fort Casey and Fort Ebey represent more than 1 million discreet visitors to Whidbey Island. Parks on Camano Island are key tourist attractions that bring significant revenue to local artists and related guest services. (<http://www.whytourismmatters.com/regions/nwwashington/default.html>) The leisure and hospitality industries account for over one in four jobs in San Juan County. Port Townsend has 1.5 million yearly visitors versus a base of only 10 thousand residents.

The military is expanding resources – air, land and water -- to build national security, readiness *and* strength. This goal is stated as a high priority of President-elect Trump. The representatives at the Public Meeting and the Guide are transparent about the need to expand in the future. Navy personnel have told me that they are already working on the *next* set of expansion plans beyond what is covered in this and other Environmental Impact Statements.

In law, there is the 'reasonable person'. This hypothetical person in society exercises average care, skill and judgment in conduct, and serves as a comparative standard for determining liability. In the case at hand, the 'reasonable person' might ask, "*With escalating objections from citizens, schools, towns, agencies, environmentalists, businesses and others, why would the Navy -- in a mode of mounting its military strength -- continue to locate Growlers on Whidbey Island?*"

There is ample air space, remote non-National Park lands and oceans that permit military and citizens to be in *adjacencies* rather than to overlap. In this way, we would be 'good neighbors' that better respect one another's differences and needs.

## **2. AUDIOLOGY IMPACTS NOT FULLY CONSIDERED & TESTED**

Whidbey Island, San Juan, Skagit, Jefferson and Clallam Counties are retirement areas mainly because of favorable climate, cultural considerations, recreational and environmental appeal.

For example, 32% of Jefferson County's population is over age 65 compared to 14% in Washington and 12% in the U.S. The median age is 54. It is the oldest county in Washington, and 10th oldest in the U.S. ([http://www.bizjournals.com/seattle/morning\\_call/2012/08/jefferson-county-has-washingtons.html](http://www.bizjournals.com/seattle/morning_call/2012/08/jefferson-county-has-washingtons.html))

Research says that one of every three persons over age 65 has some kind of hearing loss. It is a major public health issue, and the third most common physical condition after arthritis and heart disease. (<http://hearingloss.org/content/basic-facts-about-hearing-loss>)

I am personally deaf in one ear, and have a cochlear implant. I also am a teacher in greater Port Townsend. When the Growlers fly, I must pause speaking and stop facilitating class conversations due to noise. The Growler jet noise trumps the human voice and ability to hear.

I conferred with the Navy audiologist from San Diego who was present at the Navy open house at Fort Worden. He stated that persons with hearing loss are *much more* negatively affected by Growler jet noise compared to individuals with normal hearing.

Therefore, expanding Growler operations is not appropriate in a retirement region where the incidence of hearing loss is significant.

## **3. SEGMENTATION AND CUMULATIVE EFFECTS**

Segmentation by the Navy is a *huge* issue that can no longer be ignored or tolerated. The 'reasonable person' might observe: "*Growlers, submarines, SEALs, explosives and other warfare are 'besieging' peacetime citizens of western Salish Sea counties, day and night, for long periods at a time, and sometimes simultaneously.*"

The word 'besiege' is strong, yet the war exercises are intrusive, unsettling and sometimes harmful to life and property.



Harmful impacts are not accurately portrayed because the Navy performs *individual* environmental statements by geography for various kinds of Navy activities on the West Coast. This division, while important, substantially underreports potential environmental damage, especially to the unique eco-system of the Salish Sea, which is a precious resource swarming with marine life, and 113 endangered species. The ailing Southern Resident Killer Whales head the list.

Below are samples of Navy activities that, combined, intrude on the waters, air and land in *significant* negative ways. I know about these five examples; I am not familiar with lists for Anacortes, Bellingham, Whidbey Island, San Juan's or Puget Sound.

- a. Northwest Training and Testing**– This five-year plan involves Navy sonar, which damages or kills marine mammals and other marine life, missiles, large vessels that contribute to ocean noise pollution, mine warfare, gunnery operations and underwater testing of equipment. Much of the Salish Sea has a hard bottom, which makes it an echo chamber, increasing the volume of sounds.
- b. Port Angeles WA Major Pier Construction on Ediz Hook** This new pier entails a large fuel storage tank, seven sizeable berths for escort ships and lodging for 20 personnel. There will be 144 permanent and 88 temporary pilings, creating acute noise that will cause takes, behavioral disturbances and physiological damage to sea life.

There is a harbor site readily available to the Navy that does not require this kind of construction and expansion.

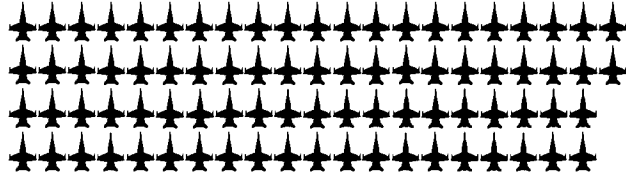
- c. Electromagnetic Warfare Training over Washington's Olympic Peninsula** – "Diversity is the hallmark of the Olympic National Park's mission: The park **protects** 922,651 acres, encompassing three distinctly different ecosystems — rugged glacier-capped mountains, wild Pacific coast, and magnificent old-growth temperate rain forest. These three ecosystems contain a unique array of habitats and life forms, resulting from thousands of years of geographic isolation, along with extreme gradients of elevation, temperature, and precipitation. Twenty-four endemic plant and animal species are found in Olympic National Park and nowhere else on earth."

The mission of our National Parks System is: "The National Park Service **preserves unimpaired** the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations."

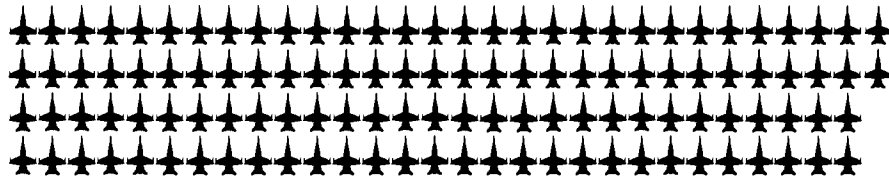
**More than 3 million people visit the Olympic National Park each year!**

The Growlers could be flying over the Olympics 16 hours a day for 260 days out of the year:

**Current Fleet**



**Proposed 2018**



(Sources: Ken Christensen, *KCTS9/EarthFix* Ashley Ahearn, *KUOW/EarthFix*)

Navy Growlers are incompatible with traditional national park land use from social, cultural, historical and environmental perspectives.

**d. Navy Special Forces Use of State Parks for Training, January 2016**

– The Navy’s access to traditional recreational and cultural land use is an issue. The military is approved to use 68 parks, marinas and boat ramps in Puget Sound, the Strait of Juan de Fuca and Washington’s west coast. Such war training will include simulated combat exercises, the use of mini-submarines and other landing craft, which will deposit Navy SEALs carrying "simulated weapons" on beach and state park areas. This program may be a public security risk. A 'reasonable person' might ask, "Why are park lands under attack and the public at risk during peace time?"

**e. Naval Magazine Indian Island Munitions Depot**

– I live directly across from this Depot, the largest on the west coast, and have witnessed several major pier expansions. Each capital improvement enhanced the capabilities to serve more warships effectively and safely. The Navy assured the public of one submarine a year; this number has long been surpassed.

The public is not privy to the risk to which it is exposed, despite repeated requests and court actions.

In tandem with expansions is the increase in lighting systems, including floating blinking lights, which, together, create night sky pollution. Twelve years ago, I looked across to a quiet, low-light island and enjoyed the night sky. Today, in contrast, a 1,500-foot pier network is like a major airport with runways. The *unshielded* strong lights create bright glare. I have had to install blinds on my windows to keep the light from interfering with my sleep.

Light pollution bleaches the night sky. It also wastes electricity, disrupts life for animals such as otters, seals, bats and birds, and is linked to everything from insomnia to breast cancer.

Lights are absolutely necessary for safety – that premise is not questioned. The questions concern the layout of the pier, positioning of vessels and the largest Navy crane, direction of lights, use of shields and the uncertain wisdom of doing high risk work during night time hours. This concern for safety leads to the next issue.

#### **4. SAFETY**

In addition to safety concerns already raised is the increased potential for accidents and security breaches that come with *more* Growlers, *more* Naval training and exercises, *more* vessels, multiple landing fields and pier expansions. It is a statistical fact.

On March 11, 2013, all three crewmembers aboard a Navy EA-6B Prowler jet assigned to Electronic Attack Squadron 129 (VAQ-129) at Naval Air Station Whidbey Island were killed when the aircraft crashed in an unpopulated area approximately 50 miles west of Spokane, WA.

**Three recent dangerous incidents in the latter half of 2016, two relating to Growlers, gravely concern my confidence in safety.**

- a. **August 18, 2016** The nuclear-powered, ballistic-missile submarine USS Louisiana and a Navy offshore support vessel collided while conducting *routine* operations in the Strait of Juan de Fuca, according to Submarine Force Pacific. Both vessels incurred damage. The results of the investigation are not available.

**THE PUBLIC SHOULD HAVE ZERO RISK EXPOSURE  
TO NUCLEAR INCIDENTS.**

**b. November 2016** The Navy's Coupeville OLF airfield is responsible for toxic contamination of some surrounding wells of citizens. The Navy continues to investigate drinking water sources, and PFCs are a factor due to historic use of Aqueous Film Forming, which is a fire suppressant.

**c. December 16, 2016** Two Navy aircrew suffered severe injuries at Naval Air Station Whidbey Island. The pilot and an electronic-warfare officer were preparing to take off on a training mission in an EA-18G Growler jet. The transparent jet enclosure known as the canopy broke apart. As of January 6, 2017, neither man has been released from Harborview Medical Center in Seattle

A 'reasonable person' might conclude, "*Three serious incidents within four months is three too many, and by all measures unacceptable for routine operations.*" The record does not merit approval for expansion.

## **5. NOISE MITIGATION TECHNOLOGY**

Commercial airlines and motorized vehicles have noise restrictions, as do city ordinances and apartment leases. The Navy should not be exempt from similar standards protecting citizens and the environment from undue and harmful noise. The EIS makes reference to noise abatement policies, which help, yet are not sufficient measures.

New noise mitigation technologies or design refinements that are currently being tested are **essential**, not 'nice to have' in the future. Therefore, I recommend that the Growler expansion be placed in moratorium until permanent noise mitigation technology is in place. This step would greatly minimize polarities due to noise.

## **6. TESTING OF AREAS ON NATIONAL REGISTER OF HISTORIC PLACES**

Portions of the downtown and uptown districts of Port Townsend are on the National Register of Historic Places. Testing is necessary to determine the short and long-term consequences of Growler vibration and noise on older structures in the region in which Growlers fly.

**CLOSING**

The six major objections raised in this letter recommend the following actions for the Navy:

- Acknowledge fully that continued future expansion of Navy national security readiness is incompatible with growing western Washington retirement communities whose economies rely on tourism, and whose environments contain uniquely fragile ecosystems and over 100 endangered species. This recognition calls for relocation of the base for Growlers, training and exercises.
- Accurately portray the Growlers audiology impacts on an aging population of our coastal counties.
- **Combine the impacts of multiple environmental statements to see the true effects on humans, animals, plants, land and the environment. Only then, make decisions.**
- **Have firm zero tolerance for nuclear incidents**, and fully assess safety issues and recent serious accident records toward denying Growler expansion and beginning to justify relocation of the base to a safer site.
- Place a moratorium on additional Growlers until noise mitigation technologies and design refinements being tested are approved and in place. Such improvements might allow Growlers and coastal communities to co-exist.
- Test the effects of various levels of Growler noise and vibrations in areas on the National Register of Historic Places.

I would like to have confirmation that this email letter was received.

Yours truly,

[Redacted signature]

[Redacted address line]

Port Townsend, WA 98368

[Redacted address line]

Coupeville, WA 98239

We retired and bought our home in Ebby's Reserve in 1996. The use of the OLF was tolerable then....with about 2500 touch and go landings. Some periods when deployment was imminent the flights increased but still within reason. This changed around 2010 and became absolutely intolerable in 2012 when the number of T&Gs went over 12,000. Now we are told that the Navy plans to go up to 35,000, or over 12,000 for plan B or if they must to almost 9,000. This will destroy property values in this beautiful area. We worked for 35years to afford to live here and with the Navy's plans on expansion this will all be gone. I have concerns for the businesses in Coupeville too as tourists will not want to come to visit and deal with the excessive noise created by the Growlers. There must be another area for this practice. We support our military but not when it destroys a lifetime of labor when all we want is to live in a peaceful and tranquil place. Safety is another issue. Six Growlers have crashed last year. If one went down here many lives could be lost. We are also worried about our water which according to the news has shown harmful chemicals in wells near the OLF. All in all good people you must find another area for this exercise. Too many homes have been built around the OLF within the last 30 or more years.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.a. Regional Land Use and Community Character

**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 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:**

*After working for 40 years we chose to retire on Whidbey Island due to the protections afforded in Ebey's Reserve and for the beauty & tranquility of this area. The FCPs were at a minimum - somewhere around 3,000 or less. This was in 1996. Around 2011-12 the number of FCP grew to 12,000 and this was absolutely intolerable as well as being a safety issue. You must find another alternative for your FCPs. Coupeville has grown to the point where these landings are a health and safety concern to large to ignore.*

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

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

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



**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 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

Anacortes, WA 98221

I am very concerned that the increase in jet noise will adversely effect the quaility of life on Widbey Island, Fidalgo Island and the water that surrounds us. Life could become unlivable if the noise pollution increases. What effect will it have on children in schools trying to learn. What effect will it have on the well being of the inhabitants of the sea, including the local killer whales. What effect will the increase in noise and vibrations produced by the jets have on all living things in this area. Surely there is a better site to locate the added number of Growlers. This area is too populated for this kind of activity.

1.a. Thank You

12.n. Quality of Life

2.n. Alternatives Considered But Eliminated

4.o. Classroom Learning Interference

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Port Townsend, WA 98368

Dear Sir/Madam, Two years ago, in January of 2015, I wrote to express my deep concerns about the huge expansion of Navy activity on Whidbey Island and the Quimper and Olympic Peninsulas. Neither of my major concerns has been sufficiently addressed. The DEIS is so poorly prepared and non-compliant with NEPA and CEQ that a revised draft is absolutely necessary. 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." It is known that the people closest to the airfields are already suffering health effects from the noise experienced in their homes and schools and on their children's playfields. They also suffer a variety of monetary losses from property depreciation, an inability to sell their homes and businesses, health problems, and decreased tourism to the area. 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. 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 impact caused by naval flight operations. 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." Yet, 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. This piecemeal approach by the Navy is clearly illegal. 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. Yet 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. The Navy has failed to present compelling reasons why national security is dependent on the increasing number of Growler aircraft being used for training only at Ault Field and OLF and over the surrounding area. The weak arguments which dismiss off-Whidbey FCLP venues are largely based on cost and convenience, neither of which creates a national defense threat. None of the arguments trump the tremendous negative impacts to the region, some of which are listed above. I urge that this DEIS be declared unsatisfactory and even illegal and that another be prepared which addresses seriously and honestly the many problems associated with this Navy activity on Whidbey Island

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 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.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 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.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

and the Quimper and Olympic Peninsulas. Thank you for considering my comments.  
[REDACTED] Port Townsend, WA 98368

Port Townsend, WA 98368

1.a. Thank You

1.c. Segmentation and Connected Actions

The Navy has asked for comments on a series of expansions of military activity on the Olympic peninsula and in Puget Sound. We have been receiving about one request per year for various incremental increases in military activity. Can't we see the Navy's overall plan for military use of this region? Then, those of us who live here would be able to know more fully what the Navy intends. Such a plan would require a full EIS that would give us a chance to know the real impacts and tradeoffs. What is the Navy trying to hide?

**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 LOPER ISLAND, WA - 98261

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

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

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

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

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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

ALL OF THE NOISE MODELS USED IN THE DRAFT EIS SHOULD BE REDONE USING A MORE ACCURATE NOISE SIMULATION MODEL, SUCH AS A.A.M.. DETAILS SHOULD INCLUDE TYPES OF AIRCRAFT, TIME AND PLACES OF MEASUREMENT POSITION OF MICROPHONES, ETC.  
THE NAVY MUST ISSUE A REVISED EIS, AT LEAST FOR THE PORTION RELATING TO NOISE IMPACTS, TO BE COMPLIANT





# 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 Aviation Services

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

Are there plans for accepting applications from South end Lopez property owners for re-investment for a loss in value of properties. Real estate brokers are required to make increased when they aircraft noise when listing South end properties.

DO YOU HAVE A BOUNDARY ESTABLISHED FOR NOISE LEVELS FOR THE SOUTH END OF LOPEZ?

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.k. Compensation to Citizens for Private Property
- 4.a. General Noise Modeling

Anacortes, WA 98221

We attended the meeting which you had in Anacortes on December 8th. We live close the ferry dock near area R10 in Skyline. First, thank you for your service to this country. I understand it is a needed function. Also thanks for the presentation and booklet, as I learned a lot from the pilots and other personnel. Second, the noise produced can be very extraordinary loud with pronounced low frequencies. It is distressing to be in your own living room where all functions are forced to stop. But it's important to distinguish not all events are equal. I have learned from the pilot it's worse when there is a holding flight problem. The jets travel very slowly and produce more long consistent noise. It's important for the Navy to avoid this problem as much as possible. Third, I read on your online materials that the Navy made no provisions for noise was made in their ordering specifications. But for this jet to work it needs to fly low so it has different needs than the standard F18A it was based on. I think this was a mistake by the Navy. It was amazing -- just two days ago a Boeing dream liner 787 passed overhead -- about the same altitude as Growlers -- and I just could not believe how quiet it was. Oh my goodness. The Navy should investigate how much it would cost to lower the noise on newer planes ordered. Fourth, although I prefer no new aircraft, I urge you to select Scenario A, preferably 3A, for the following reasons: • Scenario A will affect much less of the population. Since most new flights would be coming from OLF Coupeville, it makes the most sense, with option 3A adding only 339 people to the Ault Field. • Scenario A appears to be better for Navy training with "most realistic pattern to replicate carrier landing" using OLF Coupeville. • Scenario A appears to have less of a chance of holding pattern problems and extended landing patterns. As noted above, this is when the problem is worse and the noise becomes truly obnoxious. Thank You, [REDACTED]

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

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:

*P.A. 98362*

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

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

**NAVY GROWLER DRAFT EIS  
NOTES FOR COMMENTS**  
*Prepared for the public by the West Coast Action Alliance*  
(<http://westcoastactionalliance.org>)

Navy Growler EIS online comments at: <http://www.whidbeyeis.com/Default.aspx>

Dear Reader,

The deadline for comments has been extended to February 24, 2017. For more information, go to: <http://westcoastactionalliance.org>. Please use these notes as you see fit, to help inform your comments, which may be filed in two ways:

**1. Mail** your comments to:

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

**2. Go online** to cut and paste them into the Navy's comment box, at:  
<http://www.whidbeyeis.com/Comment.aspx>

*These comments are detailed, but detail is what's needed* to qualify as "substantive" and thus grant the person who comments "standing," which means the legal status to continue to participate in the process, either via comments at the next phase of the process, or possibly in litigation at the end, should one choose to be part of a larger group that files suit.

*It's better to go long than short*, because unless you cover multiple topics in comments at this stage, you may not be allowed to bring up information you left out if there is a future opportunity to comment—unless it's verifiably "new" information. Do your own research to augment these - go to the site, download the documents, read and do keyword searches:

(<http://nwtteis.com/DocumentsandReferences/NWTTDocuments/FinalEISOEIS.aspx>)

Make these sample comments your own! There are other concerns that have not been discussed in these sample comments. You may notice that we have not editorialized about like how we feel about all this; that is up to you, but remember; feelings alone may not comprise comments that the Navy will view as substantive.

According to Navy Public Affairs Officer Mike Welding there is no character limit, and lengthy comments like these can be copied, pasted and sent in one go via the comments box.

Thanks for caring enough to read this detailed information and to participate in the process.

*Sincerely,*  
*The West Coast Action Alliance*

- 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

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

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

**3. Piecemealing projects to avoid analyzing cumulative effects is illegal.** The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions:

1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft;
2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers);
3. 2012 EA (26 Growlers including 5 from a reserve unit);
4. 2014 EA (Growler electronic warfare activity);
5. 2015 EIS discussing electronic warfare training and testing activity;
6. The current 2016-2017 DEIS (36 Growlers);
7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160.

Therefore, it has been impossible for the public to 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,

  
Port Townsend, Washington  
98368

January 6, 2017

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

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

Dear Sir/Madam:

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

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

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

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

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

Sincerely,

Name:

Address:

Port Angeles, WA 98362

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

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

Clinton, WA 98236

Hello, I am writing to express my sincere concern about the new growler jet expansion project. I have been a resident of Whidbey Island for more than three years and I love this place. The few times I've traveled up north when the planes are flying have been horrible experiences. I remember taking my family to Deception Pass and we could barely hear each other's voices through the jet noise. I also hear stories of close friends who own farms there about how deafening the planes are. They have to dash inside and gather serious ear protection just to be safe in their own back yard. This project is already causing so much harm to residents here and I can't fathom the impact of more and even louder planes. I want everyone to know that Whidbey Island residents will not stand for this! Thank you for reading and collecting messages from the community. Sincerely,

██████████

- 1.a. Thank You
- 4.q. Potential Hearing Loss
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.i. Deception Pass State Park and Other State Parks

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

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

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

1. Name \_\_\_\_\_
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_
3. Address \_\_\_\_\_ *Coupeville, WA 99239*
4. Email \_\_\_\_\_

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

### Comments

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

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

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

(over)

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



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

**Additional Concerns:**

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

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

*The contamination of our public water in town where we have schools and hospitals is a serious offense and needs to be addressed w/ greater efforts and the Navy needs to be held accountable. Additionally, there is no need to increase the growler flights so much that properties will have to be seized by the government or county to accommodate APZs.  
Do not increase flights! Our tourism, our private reserves and businesses cannot afford this.*

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

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1. Name [REDACTED]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
RESIDENT
3. Address [REDACTED] OAK HARBOR, WA. 98277
4. Email \_\_\_\_\_

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- 2.f. Use of Public Comments
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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:

This Central Whidbey is too special to be obliterated by the Navy. We can still have training and a presence here but condemning land is an outrage. Coupeville is the 2<sup>nd</sup> oldest town in Washington. Tourism is huge. How can we condone ruining this historic/benelohic area?  
BALANCE. Please listen to us !!

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(over)

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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, as a veterinarian, on central Whidbey for the last almost 30 years cannot impress enough the concerns of clients regarding their distress about growler noise. Is this trivial? The human/animal bond with respect to human health is well documented. The jets fly, the jets cover, the humans worry; it is not good. The growlers are a quantum leap in loudness compared to the prowlers - I don't care what the Navy says. Animals don't lie. Have some damn Balance !!!

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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:**

*This community, as it becomes clearer about increased flight operations, is starting to lose its best + brightest. More and more acquaintances are talking about relocating/leaving - getting out while they still have "some" property value left. Leaving because the quality of life in this incredibly beautiful place is plummeting. - Is anyone reading this? - The ~~pr~~ value of my veterinary practice that I've put my whole life into is at risk. This is breaking this community's heart. The ~~the~~ Navy could put these flight operations elsewhere + that's true.*

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Please include any additional comments and concerns here:

*There needs to be a halt to expansion of Growlers on Whidbey Island. Keep operations as they are now. We are too populated an island. The accident potential zone cannot be expanded as it will kill our property values, contaminate more water sources, have too much of an impact on childrens learning, etc. It goes on and on. We have a hospital here, schools, churches, youth centers, convalescent center, etc. the list goes on and on. the noise is unbearable and our community is being assaulted left and right. Either leave the practices as they are or go somewhere else. There are options. Our*

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- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

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

Additional Concerns:

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

Please include any additional comments and concerns here:

I am a 25+ year ~~USA~~ resident of Whidbey Island. Also a business owner. Our entire livelihood and retirement + savings via land is tied up here. What is being proposed here will be devastating to the welfare and livelihoods of Whidbey residents. We rely on tourism, Coupeville is the second oldest town in Washington state. We are a rural community with schools, churches, community centers, youth centers, old folk's homes, parks, landfills, transit stations, etc. These increases in growler operations do not belong here. Leave practices as they are or locate somewhere else. Leave maintenance here if need be. If the future is drones, then wait for that technology. I'm not even sure this will be read. Families live here. This noise is over the top now, water wells are contaminated - our way of life is threatened. We understand national security + support it - this added assault however ~~is not working~~

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

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns. *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  
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 owner/property owner of numerous properties*
3. Address [REDACTED] *DAK HARBOR, VA 22027*
4. Email [REDACTED]

- 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.
- 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.
- 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 writing today as there has to be some balance with respect to increases in Growler Activity. I am a proud American and am in no way less patriotic. We moved here knowing the Navy was here and has co existed quite nicely for years. We raised our kids here. We have a business - a [redacted] that serves much of Whidbey island. We are an island community - rich in tourism and agriculture. There has to be a balance. The noise from these Growlers has become intolerable! Kids can't sleep at night. APZ's threaten land + land values. Our life is here - our retirement + savings in this land + business. People don't want to relocate here because of noise. Life is about a healthy balance in all areas. We are

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too later  
people  
on  
island  
& not  
just  
write  
Navy-  
Please  
Keep size as it is  
or relocate these  
Growlers. Thank you.

Oak Harbor, WA 98277

We must have balance!! We are a rural, agricultural island that is also dependent on tourism. Yes, NAS Whidbey is here and up until now has lived in harmony with residents for the most part. What the navy is proposing is not good for anyone or anything, property values, the unending noise, the children who live here who can't sleep at night because of the high decibels and noise late into the night. APZ's. No! We are too populated a place for increasing of the size and scope that are being proposed!! Be a good neighbor and work with the people of Whidbey Island and the region and don't try to cram this down the throats of the people of Whidbey. I am a business owner/property owner/resident, etc. My life and my families lives are here. Our livelihood, our retirements are tied in with our real estate which is dependent on the issues that are being discussed here. Thank you.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.e. Public Involvement Process
- 2.n. Alternatives Considered But Eliminated
- 4.p. Sleep Disturbance
- 5.a. Accident Potential Zones

Oak Harbor, WA 98277

My concerns are as follows: 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. Aquifer and well contamination. Noise impacts on commercial properties including agriculture. Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields. A decrease in private property values due to noise. 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. Businesses, schools, hospital, and County and Town public government operations in the Coupeville area. Health effects from noise and low-frequency sound. Sincerely, [REDACTED]

- 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
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 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

**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)

GRAD STUDENT - UPS - HOME IS BETWEEN COUPEVILLE/OAK HARBOR

3. Address [REDACTED] OAK HARBOR, WA. 98277

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.d. Population 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.f. Use of Public Comments
- 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.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:**

If enough flights using OLF Coupeville result in APZ's surrounding OLF then Central Whidbey will essentially be destroyed. Residents will leave, businesses will fail, quality of life diminished. Please this cannot happen!  
 If you don't get enough quantity of feedback it's because normal people don't have time to read a 1500 p. EIS. I just found out about APZ's + comment period is over in 2 WEEKS, [REDACTED]

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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) \_\_\_\_\_  
3. Address \_\_\_\_\_ *Seattle, Wa*  
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

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(over)

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- 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.o. Classroom Learning Interference
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- 5.a. Accident Potential Zones
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- 7.g. Ebey's Landing National Historical Reserve
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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 grew up just outside of Coupeville and hope to return some day. My parents still live here and one sister as well. I'm very concerned about APZ's and property condemnation. It's such a wonderful community with great people. Too many planes, too much noise - it's out of any kind of balance. Why can't they train in eastern Washington where there are fewer people - they could be over the water in 25 minutes - Eberys Reserve & Central Whidbey is too special to be ruined !!! Please listen !!!

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1.a. Thank You

Langley, WA 98260

The proposed increase in Growler activity will do much to ruin the peace of our beautiful island. The horrendous sound of these operations invades the tranquillity of the Gulf Islands, San Juans, and Vancouver Island. No More !!!

Langley, WA, WA 98260

1.a. Thank You

12.n. Quality of Life

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

I am very concerned about the children of Whidbey Island who will have to endure the invasive sound of 35000 Grouse flights which are already disruptive at the current number of 6100 flights. The proposed increase is extreme, and while I hate to say "not in my backyard", I must this time because I believe this will severely reduce the quality of life for our citizens and the nature we love.

1.a. Thank You

Mukilteo, WA 98275

There should be no restrictions on the ability of the Navy to train wherever and whenever they think is most effective.

1.a. Thank You

Oak Harbor, WA 98277

We came here with the Navy and have been here 30+ years. If we as a nation want to be safe we need to ensure that our military is well prepared and well trained. OLF is an important part of that training. We don't give drivers a license without lots of practice, we should not send these pilots to aircraft carriers without a place to practice either. Thank you.

Blaine, WA 98230

Please eliminate flight tests over or near the environmentally fragile Salish Sea. Marine animals, birds, fish and humans are impacted negatively by these tests/flights.

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

Langley, WA 98260

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
6.f. Fuel Dumping

I am most concerned by the acknowledged pollution of ground water around the flight operations facilities. In the case of the OLF, I think that before operations are expanded we must better define the extent of contamination from earlier training activities. Additionally, I am unaware of any studies of foreseeable impacts of fuel dumping during irregular or emergency landing events. Please strengthen the EIS study of the OLF operations in the areas of chemical pollution of ground water, and of fuel and hydrocarbon pollution through the air onto our homes and farmland. Thank you for this opportunity to comment..



Olga, WA 98279

1.a. Thank You  
3.a. Aircraft Operations

As a resident of Orcas Island, I often hear the Growlers flying above at night. I am concerned about and against a proposed increase in the number of Growlers. It is already a disturbance to our peace to hear them flying. Could they please be re-routed to fly over unpopulated areas. 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](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

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

1. Name [REDACTED]

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

3. Address [REDACTED] LOPEZ

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 find a way ~~that~~ to come to compromise between local citizens & Navy.

There must be a way to change the flight patterns so we are NOT your sacrifice zone with all the disturbing noise that surrounds us almost daily

It is harmful to our emotional being as well as

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.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 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.

our physical health,

I want to STOP hating the Navy.

I am a patriotic citizen but feel that I am being assaulted.

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

Please print

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

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

**YOUR INPUT MATTERS**

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

January, 2017 Comments

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

1. First Name [Redacted]

2. Last Name [Redacted]

3. Organization/Affiliation

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

5. E-mail [Redacted]

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

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

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

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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

*The Navy is ignoring the impact noise levels have on ocean cetaceans lives - whales, porpoises, seals, - sea lions. Especially the ORCAS.*  
*Action: Commit to noise mitigation measures for tolerance and health of sea animals.*

1.a. Thank You  
12.h. Tourism

Anacortes, WA 98221

While adding a larger fleet of louder, updated aircraft to NAS Whidbey might sound like a good idea because of existing infrastructure and ideal sea conditions, I adamantly oppose this proposal. It's clear that the Pacific Northwest region is one of the fastest growing areas in the nation and will continue for the foreseeable future. This means that more and more people will be directly impacted by the negative audible effects of this noise. What's more, this particular area, from South Whidbey to Fidalgo island has an economy reliant on tourism. As someone who has worked in the boating tourist industry for years I routinely am questioned by these tourists why, in such a rich natural area, do we have these horrible jets flying so frequently overhead? In the summer, this is almost a daily question. By intensifying the training and loudness of these jets in the coming years we are putting at stake our coveted tourism economy and the innumerable amount of jobs these create and retain. People come from all over the world to see the islands, whales, and forests. It would be a shame to have these people who bring their money to spend decide that this area is spoiled and not want to return here again after trying to ignore the ridiculous amounts of noise while vacationing. I strongly oppose the growlers being added here at NAS Whidbey, and I hope the Navy will rethink this decision.

1.a. Thank You  
19.d. Electronic Warfare

, 98105

I oppose the Navy using Olympic Forest for war games. Please value this sacred place.



1.a. Thank You  
12.j. Property Values

Coupeville, WA 98239

We have been trying to sell our 3 parcels with an awesome home for less than we purchase and built. Now for 5 years and as we get to the contract the noise sheet come and the people don't continue. We have no price issue it is over the top wonderful well maintained built in 2008 with love and care to function and form. It has beautiful out door rooms and we have loved since we started. Others love it too. Now we are selling it by owner. We want to leave and go to our grandchildren. but this noise non-issue is detouring us. Please end this process as quickly as can. Thank you the [REDACTED]

Anacortes, WA

Scenario A is best for the future of the United States of America. The self-interest of an uninterested and uneducated few on the cost of freedom should be ignored.

1.a. Thank You

2.m. Record of Decision/Preferred Alternative



# Public Meeting Comment Form

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

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

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

1. Name [REDACTED]

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

3. Address [REDACTED]

4. E-mail [REDACTED]

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

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

The additional flights that are proposed will tear the fabric of our community apart. The noise levels are already intolerable and will only get worse. The Navy is not a good neighbor. There has been systematic disruption of our lives + property. Ebey's reserve is not to be turned into a war zone.

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
- 7.g. Ebey's Landing National Historical Reserve

Port Townsend, WA 98368

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

Please expand the review period. It is not fair or realistic to ask the public to digest this complex document in such a short period. This region, our elected officials and residents need a realistic review period to assess the effects of the proposed expansion of Growler operations on our lives and environment.



## Public Meeting Comment Form

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

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

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1. Name

[REDACTED]

2. Organization/Affiliation

3. Address

[REDACTED] Port Townsend, WA

4. E-mail

[REDACTED]

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

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

I live in Port Townsend separated from Whidbey & the NAVAL BASE by the SALISH SEA. We're within the FLIGHT PATTERNS & the EXCESSIVE NOISE of take offs & LANDINGS during their EXERCISES. Personally, the NOISE creates an uneasiness in my being & makes me feel stressed out & ANXIOUS not to mention I believe in a PEACEFUL WORLD & I think the creation of all the WAR MACHINES IS AGAINST GOD & HIS

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.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.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.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
- 6.b. National Ambient Air Quality Standards Compliance
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources

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.

Creation on Earth. (Live by the sword Die by the sword), WAR is not a Necessity, intelligence & God Realization is a Necessity! Diplomatically ~~we~~ We should eradicate all weapons from Earth & give peace to all animals & humans. I went with my family to Camp @ the Olympics (So I did not spring) & the Weekend was filled with military jets & my purpose to go was to feel a little Peace & Quiet in a setting of one of the most beautiful Parks in the World but instead I WAS HAUNTED AGAIN. The Pollution created by the military, (Air, water & noise) is contributing to an already compromised URBAN ZONE (The Seattle Area) & it won't be long before its inhabitants will be wearing masks to filter out the Air Poison. (They already do this in many Asian countries who don't protect ~~themselves~~ AGAINST these factories & their factories Air Pollution. We have an opportunity to Advance our beings to the spiritual world when we take Human form, but you can't Advance ~~yourself~~ & take advantage of this, if you're not focusing on God & creating WAR machines that is creating harm & Fear for other beings.

1-11-2017

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

Please print

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

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

**YOUR INPUT MATTERS**

1002860.0041.10

Whidbey 2016\_Comment Sheet.ai-GRN-6/23/16

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

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

**NAVY GROWLER DRAFT EIS  
NOTES FOR COMMENTS**

*Prepared for the public by the West Coast Action Alliance  
(<http://westcoastactionalliance.org>)*

**Navy Growler EIS online comments at: <http://www.whidbeyeis.com/Default.aspx>**

Dear Reader,

The deadline for comments has been extended to February 24, 2017. For more information, go to: <http://westcoastactionalliance.org> Please use these notes as you see fit, to help inform your comments, which may be filed in two ways:

**1. Mail** your comments to:

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

**2. Go online** to cut and paste them into the Navy's comment box, at:  
<http://www.whidbeyeis.com/Comment.aspx>

*These comments are detailed, but detail is what's needed* to qualify as “substantive” and thus grant the person who comments “standing,” which means the legal status to continue to participate in the process, either via comments at the next phase of the process, or possibly in litigation at the end, should one choose to be part of a larger group that files suit.

*It's better to go long than short*, because unless you cover multiple topics in comments at this stage, you may not be allowed to bring up information you left out if there is a future opportunity to comment—unless it's verifiably “new” information. Do your own research to augment these - go to the site, download the documents, read and do keyword searches:

(<http://nwtteis.com/DocumentsandReferences/NWTTDocuments/FinalEISOEIS.aspx>)

Make these sample comments your own! There are other concerns that have not been discussed in these sample comments. You may notice that we have not editorialized about like how we feel about all this; that is up to you, but remember; feelings alone may not comprise comments that the Navy will view as substantive.

According to Navy Public Affairs Officer Mike Welding there is no character limit, and lengthy comments like these can be copied, pasted and sent in one go via the comments box.

Thanks for caring enough to read this detailed information and to participate in the process.

*Sincerely,  
The West Coast Action Alliance*



**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,”

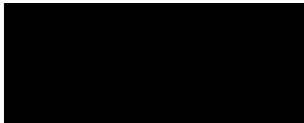
which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal 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

Anacortes, WA 98221

I am fully supportive of the U.S. Navy's intentions to make use of the DoD Appropriations Act of 2014, and adding 36 or more EA-18G aircraft and supportive facilities and personnel, to expand its operations at NAS Whidbey, including FCLP at Ault Field and OLF Coupeville. There is nothing harmful about this expansion which is not thoroughly outweighed by the necessity of maintaining and increasing the Navy's electronic attack capabilities.



Poulsbo, WA 98370

I am an Olympic National Park donor and recreationist, and come from a Navy family. I'm writing to urge you to strongly reject the proposal to allow Growler operations over our National Park. The ONP/ONF is where we go to get away from noise - it's our respite and place for reflection. You must recognize that it's one of the last quiet places that we as citizens and people who love our country can go to get away from everyday noise and stress. The Navy has other options for their training areas. I urge you to protect our nation's treasure by disallowing the Growler operations over our National Park and National Forests. Thank you.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area

Anacortes, WA 98221

1.a. Thank You  
12.m. Education Impacts

Although I live in Anacortes, I have a weekend house in Greenbank near OLF. While almost no one likes jet noise, it isn't frequent enough to be annoying. The proposed increase won't change that. Schools here in Anacortes have room for additional students and I would welcome additional military families in my community.

Bellingham, WA 98225

My concerns are as follows: 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. Aquifer and well contamination. Noise impacts on commercial properties including agriculture. Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields. A decrease in private property values due to noise. 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. Businesses, schools, hospital, and County and Town public government operations in the Coupeville area. Health effects from noise and low-frequency sound. Sincerely, [REDACTED]

- 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
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 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

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

January, 2017 Comments

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

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

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

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 been living on Lopez Island for most of the last five years and have experienced regularly the harsh intrusion of this low rumble from jets. Whether it comes as I am reading before bed, during my day's work, or as I am eating breakfast, the disturbance is quite harsh. If this impact is so tangible to me, I can only imagine there are far-reaching impacts on other beings in my 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

Greenbank, WA 98253

That Whidbey Island is a rural area with a small population does not make it an appropriate location for a huge increase in training flights. That NAS has been on Whidbey for decades does not mean that the Navy has carte blanche. The impact on the physical environment, on humans and on animals living here from hundreds of training flights of low flying military fighter planes will be devastating to the health of this community in all aspects.

1.a. Thank You

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

**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)  
*Whidbey Island Resident*

3. Address [REDACTED] *Greenbank WA 98253*

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.d. General Project Concerns
- 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:**

That Whidbey Island is a rural area with a small population does not make it an appropriate location for a huge increase in training flights. That NAS has been here for decades does not mean that the Navy has carte blanche. The impact on the environment, humans and animals living here by hundreds of flights of low-flying military aircraft will be devastating to the health of this community.

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

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

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

Seattle, WA 98117

1.a. Thank You

18.b. Average Carbon Dioxide per Aircraft

I am particularly concerned that the increased carbon emissions from the proposed action. If each jet burns 1304 gallons per hour and produces 12.5 metric tons of CO2 per hour, that is 23% more than the annual CO2 emissions of a WA state citizen. I believe this represents a very significant environmental impact that has not been sufficiently taken into account.

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

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
- 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).

1.a. Thank You

18.a. Climate Change and Greenhouse Gases

Clinton, WA 98236

I just want you to know how much My wife and I appreciate all of you at the Whidbey Island base. Now I know there are a bunch of pussy libtards winning about the noise. Well I love hearing the sound of protection over my head. I sometimes drive up to watch the planes . Its just like a libtard to move next to a airfield and then complain about the noise. they had to sign a waiver to acknowledge that they were buying property with airports in the vicinity. So if anyone should move it should be them. A win win in my book LESS LIBTARDS!!!! thanks and keep up the good work, [REDACTED] Oh and PS if you could knock down a few of the Planes spraying the crap in the air make sure they fall in the bay.

**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)  
*Home owner / Whidbey Resident for 40 years*

3. **Address** \_\_\_\_\_ *Greenbank WA 98253*

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.
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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
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- 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.a. Regional Land Use and Community Character
- 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:

Written for [redacted] (91 yrs) by her daughter [redacted].

I have lived on Whidbey for over 40 years. My first home here was in the flight path of the OLF. Back then we had to persuade the Navy not to fly at night and on the week ends so that we could have some time of peace in which to sleep and enjoy our days off. It saddens me to think that we are still having to struggle with the Navy over the negative effects of training flights but now of even bigger and louder planes. This island attracts people who love the outdoors and the farms. How can this way of life continue if the Navy is flying of flights daily?

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.



Greenbank, WA 98253

1.a. Thank You  
12.n. Quality of Life  
2.n. Alternatives Considered But Eliminated

I have lived on Whidbey for over 40 years. My first home here was in the flight path of the OLF. Back then we had to persuade the Navy not to fly at night and on the weekends so that we could have some time of peace in which to sleep and enjoy our days off. It saddens me to think that we are still having to struggle with the Navy over the negative effects of training flights but now of even bigger and louder planes. This Island attracts people who love the outdoors and the farms. How can this way of life continue if the Navy is flying dozens of flights daily? This training must be able to be done elsewhere.

langley, WA 98260

1.a. Thank You

4.r. Nonauditory Health Effects

I work at an organization in Coupeville and am vehemently opposed to increased and higher decibel noise to be allowed in that area. I find the noise a health and life safety issue which should be banned!

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

Open House Comments

Fill in and Submit at the Open House

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

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

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

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

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

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

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

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 3.f. Field Carrier Landing Practice Operation Totals
- 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](http://www.QuietSkies.info)

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

\_\_\_\_\_  
 - GET THE AUSA House Built  
 - Get Lopez + OTHER POPULATED AREAS OUT OF  
 The FLIGHT PLANS (Continue on the back) PLAN

Stop or Limit NIGHT TIME FLIGHTS

DO NOT INCREASE THE # OF PLANES  
ASSIGNED TO WTHIOBY

We HAVE HAD ENOUGH!

Stanwood, WA 98292

I live near Lake Ketchum in Snohomish Co. We are under a frequently used, day and night, low altitude flight path. The 30 Growlers already stationed at NAS Whidbey are by far and away the most frequent and LOUD disturbance at our otherwise quiet and peaceful home. Additionally the Beautiful State Parks at Deception Pass are becoming nearly unusable from the NOISE and STINK of jet exhaust! I strongly believe that stationing 30 More Growlers at Whidbey is a travesty. How much of this BEAUTIFUL country are we supposed to sacrifice to save it from what? I say, no more.

1.a. Thank You

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

Port Townsend, WA 98368

1.a. Thank You

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

The growler noise cause extreme discomfort. On a recent trip to Deception Pass State Park it felt like a war zone. This beautiful park should be removed from the system. Destroying citizens lives in Port Townsend is NOT patriotic.

Port Townsend, WA 98368

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

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

Port Townsend, WA 98368

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.



1.a. Thank You

Port Townsend, WA 98368

The Growler impacts all citizens who are helpless to your control.

Port Townsend, WA 98368

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

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

Port Townsend, WA 98368

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

The have been NO alternatives except the ones the Navy will force on the people.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Port Townsend, WA 98368

Why pick a populated area, war training somewhere else.

Port Townsend, WA 98368

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

Port Townsend, WA 98368

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

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

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

1.a. Thank You  
10.I. Bird Migration

Port Townsend, WA 98368

High disturbance in the environment will change bird migration patterns.

Port Townsend, WA 98368

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



1.a. Thank You

Port Townsend, WA 98368

Listen to the people.

1.a. Thank You

Anacortes, WA 98221

Our military needs to be able to operate out of coupeville.

Greenbank, WA 98253

Along with the obvious issues, of diminished quality of life, decrease of property values, decreased tax revenue for island county, extremely high decibel exposure(misrepresented by the navy by averaging, vs actual). Skyrocketing housing demand in surrounding areas. Unaffordable rent, increased homelessness, contaminated water in a single aquifer area, another concern I have - concentrated military personnel, and concentrated numbers of planes in a small area. Seems logical that this makes NAS and Whidbey Island targets for terrorists or rogue countries.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations



# Public Meeting Comment Form

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

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

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

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

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

3. Address  \_\_\_\_\_ Greenbank, WA 98253

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

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

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

*This is wrong on so many levels*  
1. Financial impact i.e. disruption of business transactions, reduced property values, ↓ tax base to the county, ↓ deterioration of roads etc.  
2. Education - classroom disruption, ↓ quality of learning  
3. Health - disruption of peace, tranquility - ↑ stress levels for indefinite periods minutes → hours → days → years. Exacerbation of chronic disease; impeded healing  
4. Misleading info from the Navy that they were working to ↓ noise on jet engines, that they would reduce night flight.  
5. We moved to south Whidbey to get away from noise, to retire to one of the most beautiful places in the U.S. Please don't increase activity at OAF!!!

Please print • Additional room is provided on back

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

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

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.j. Property Values
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation

Sequim, WA 98382

- 1.a. Thank You
- 1.b. Best Available Science and Data

I object to the proposed increase of Growler jets operations out of NAS Widbey Island over the Electronic Warfare Range (EWR) including flights over Olympic National Park and Peninsula. These jets are extremely loud and disrupt the peace and quiet not only in the Park and rural areas but also in the cities on Whidbey Island, as well as in Port Angeles, Sequim, Port Townsend and others. I can't believe the statement that the number of flight's over the EWR will only increase by 10% when you are planning on increasing the number of jets stationed at NAS Widbey from 94 to 153. Thank you for your consideration. Capt. [REDACTED] (retired).



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1. Name [REDACTED]
2. Organization/Affiliation \_\_\_\_\_
3. Address [REDACTED] GREENBANK 98253
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

1. CONCERN ABOUT SEEING LOW LEVEL OVER-FLIGHT (~1000 AGL) OF OUR COVERED HORSE ARENA 2 MILES SOUTH OF GREENBANK. LIVED THERE 10+ YEARS, PREVIOUSLY DID NOT KNOW OVER-FLIGHTS, HAVE SEEN GROWLERS THIS FALL/WINTER?

2. I WAS FORMERLY NAVY AIR TRAFFIC CONTROLLER, THEN DID SOME FLYING! RECENTLY STARTED FLYING AGAIN OUT OF WIO (WHIDBEY AIRFIELD) HOPE NO LOW LEVEL NAVY FLYING OVER WIO WHILE I AM ON CLIMB OUT OR APPROACH !!!

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

Greenbank, WA 98253

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

I served as an air traffic controller in the US Navy for 4 years and am a pilot. That Touch and Go runway is too short and dangerous. So, when you have an accident with all of these future high levels of activity, and it will happen here is the outcome. The property values locally will go down significantly, and people will get underwater on their home loans, they face foreclosure and then the Navy will be happy. YOu can buy land for cheap and make the runway the 8500 ft long that it SHOULD be.

Coupeville, WA 98239

EIS Response February 24, 2017 RE: Response to the Draft EIS for the continued use and increased FA-18 Growler Operations at NAS WI OLF. EIS Project Manager, Our names are [REDACTED]. We own the [REDACTED] Farm a scant quarter of a mile north and east of the Coupeville OLF. We are concerned that the EIS as written does not completely address the health and safety issue as they apply to the area surrounding the Coupeville Outlying Field. To Wit: • The property is a federally listed class one historic property having been a Federal Donation Land Claim to John Smith and being in continuous use since 1865 under the ownership of only three families. • It lays within the noise and crash zone of the Outlying Field and is greatly impacted by the noise and crash potential area, but as yet no serious attempt at a NEPA or NHPA (Section 106) review of its impact on historic properties has been completed. • The noise vibration, and frequency of use and its impact on the historic buildings and the operation of business carried on there has not been adequately addressed. • The impact on visitors to the historic properties and to visitors passing by on Highway 20 has not been fully addressed. The noise and vibrations from flight operations are extreme in the area of Smith's Prairie where the Coupeville Outlying Field is located, often rising over 100 decibels. • The USN has never measured noise or vibrations on our property ¼ mile North and East of the OLF. • The historic farmhouse located and known as the Kineth Farm was built in the 1890's by a technique commonly known as balloon framing wherein the walls are 2 inch thick layers. No framing inside the wall structures and as such there is no way to mitigate the noise by insulation. The walls shake and vibrate with each flight operation. This has not been studied or addressed in the EIS. • Since purchasing the property in 1974, I have voluntarily [preserved this property and given easements to the government in favor of preservation of this farm cluster as well as made my/our living here. The EIS fails to address additional restrictions that will be placed on the property and how that will affect the peaceful use of my home and the operations of my livelihood and the business that runs out of our barn on the property. • The EIS fails to address the effects of the increased operations on health and welfare or increased operations on agricultural business and other commerce or the peaceful continued use of the property that I/we have owned for 43 years. • The increase of flight operations of the FA-18 Growler FCLP practice operations is not explained in the EIS and neither is the arbitrary percentage of use increasing to 80% of total operations explained in reasoning or methodology. This would appear to place an unfair burden on the community and our National Historic Site which I/we have gone to great expense to preserve the peaceful and continued use of the property and where I intend to continue to make my living. Hopefully these matters will be addressed before any more damaging action is taken. Respectfully, [REDACTED] Coupeville, WA

1.a. Thank You

12.e. Agriculture Analysis

3.a. Aircraft Operations

8.c. Noise and Vibration Impacts to Cultural Resources

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



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 to the best of my ability going to try to address my concerns about the Growler electronic warfare issue before the mid February deadline which I thank you for extending. I am basing my letter on a much more detailed letter written by others but decided that rather than just cutting and pasting what others had written (which would have been far easier and a lot less time consuming), I would actually read and try to understand the issues and put them in my own words. In a few cases I left the wording as it was just because it was brief and to the point. I trust that this letter, although not as detailed as some, will still be taken seriously.

1. I am concerned that you seem to be considering the noise issue in a rather limited way. We over in Port Townsend are affected by the noise to the point where it wakes us out of a deep sleep. The DEIS analyzes noise only within 6-10 miles of a corner of the runway. We hear these jets when we are hiking in the National Park. Folks over in Neah Bay hear the noise too. You need to evaluate what we hear.

2. Noise will also adversely impact cultural and historic sites far beyond your designated Area of Potential Effect. The US Department of Housing and Urban Development has said that a 65dB level is normally unacceptable and a 75dB level is unacceptable yet folks have recorded noise levels even in outlying areas of twice that level. 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. According to what I read, you are not paying attention to the cumulative effects of aircraft training and testing activities affecting this area including Whidbey Island, the Olympic Peninsula and the San Juan Islands. You say that each part of the program is within tolerable limits and will not have an environmental impact but when you heap them all together, the story is different. How can the Navy say there will no significant impacts if the number of Growler flights from OLF Coupeville will go from 3200/year to 35,000? So the 36 Growlers you are adding may not seem a lot but those added to the ones that exist means there is going to be a lot of impact.

4. The DEIS has not analyzed the issue of groundwater and soil contamination from the use of firefighting foam on the runways. If on November 7, 2016 you sent a letter to 100 households expressing concern about the fact that PFAS substances had spread beyond Navy property, why isn't this mentioned in the DEIS nor in the 2005 or 2012 EAS? The Department of Defense has said that there is no technology to clean up this kind of contamination. The Navy needs to be willing to test wells and also provide people with alternative sources of water if their wells are found to be contaminated.

5. Why are you not discussing the possible impacts of electromagnetic radiation when the Growlers locate the ground transmitters?

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  
 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.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.i. Other Noise Metrics Not Currently in Analysis  
 4.l. Points of Interest  
 4.m. Supplemental Metrics  
 4.o. Classroom Learning Interference  
 4.p. Sleep Disturbance  
 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

6. Why aren't we being allowed to comment on this project after this? Why can't we comment on the Final EIS? New information is going to come up that will affect this issue and we should be able to take use this as the process unfolds.

7. It is my understanding that the Navy has not suggested reasonable alternative to reduce noise instead keeping the same number of flights but having them affect different areas. This somehow seems unfair. Populous communities will win with more voices and smaller communities will lose out. And because we can't comment on the final EIS, we are not going to be able to comment on how the Navy has decided on the final noise allotments.

9.Noise from the Growlers on the Olympic Peninsula has not been properly evaluated as it did not include the ground based mobile emitters, and the EIS only listed the Darrington Area and W-237 which are not on the Olympic Peninsula.

9. No noise modeling has been done for areas other than those right around the runways. Areas surrounded by water like Port Townsend, or the Hoh which is flanked by steep mountains need their own modeling done. Sound over water carries much better than sound over land. Sound near mountains echoes.

10. It has been rather quiet this winter. But it is not that way in summer when the Growlers roar overhead. I take it you are doing some sort of average (DNL) in your assessment of the noise level. No noise averaging with a lot of noise means the noise overall is okay. But it doesn't work that way in real life. In summer when I am jolted from sleep by a Growler, I am not comforted by the fact that in winter I am not. And from what I read, wildlife feel the same way.

11. The Growlers are a lot noisier than commercial aircraft. They can fly at lower altitudes and do maneuvers that commercial airliners do not (like aerial combat maneuvers) and they use weaponry that emits electromagnetic hums. I did not choose to live near Seatac for a reason! Therefore although use of DNL may seem okay to the Navy, it doesn't work for me.

12. 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.

13. 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>)

14. 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.

15. So am I right in understanding that Growlers will not fly during the opening day of hunting season? Really? Hunters get exempted from Growlers roaring overhead but we who love to hike for the silence in the mountains do not? I think you need to consider all of us and the affects that Growler noise has.
16. Although I appreciate the fact that you are trying to fly your Growlers pretty high up over populated areas, your previous NEPA documents did not say that over sparsely populated areas you could fly much lower. I think you need to be much more upfront about this. The noise down low is going to be really loud. We need to know actually how much noise is going to be generated by Growlers flying at 1000 feet and how much this will effect public health. So the Navy really needs to produce a supplemental EIS or give us a chance to comment on the final EIS.
- 17 There needs so be a special consideration for schools. Don't tell me this is not important. I was a school teacher. If a Growler jet roared over my 6th grade class in the middle of a discussion of how to use a semicolon, let me tell you it would interrupt the lesson! I taught in Vermont. No Growler jets. Only thunderstorms but those we couldnt' control.
18. 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.
19. 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.
20. In the Navy's consideration of impacts on wildlife, it can't just measure what happens near runways. I don't live near the runway and I am impacted! If in fact you are increasing the number of aerial combat maneuvers from 160 to 550 annual events, this is going to impact wildlife a lot. I take it that dogfighting requires the use of afterburners which emit a lot of noise. Do not tell me that this will not impact wildlife. It impacts me and I at least when jolted from sleep know whence the noise comes and am not fleeing in terror. I do, however, call your phone line, leave a message and complain grumpily.
21. 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.

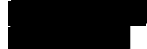
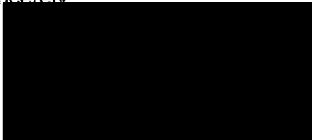
In conclusion, I will once again quote what I feel is a relevant statement. It is a poem by Wendell Berry and captures what I feel about the wilderness or a walk in the woods near by. I realize this is not quantifiable for an EIS, but I do think it is important.

The Peace of Wild Things

When despair for the world grows in me  
and I wake in the night at the least sound  
in fear of what my life and my children's lives may be,  
I go and lie down where the wood drake  
rests in his beauty on the water, and the great heron feeds.  
I come into the peace of wild things  
who do not tax their lives with forethought  
of grief. I come into the presence of still water.  
And I feel above me the day-blind stars  
waiting with their light. For a time  
I rest in the grace of the world and am free.

Thank you for considering these comments.

Sincerely,



Port Townsend, WA 98368



2/8/2017

Port Townsend, WA 98368

The Growlers wake us from sleep. They break the silence of our mountain sojourns. They make it so people don't want to visit the Peninsula. The frequency and loudness of the Growlers is going to negatively impact our lives in many ways. I realize that we have no voice here, not really. But I would ask that you at least think of ways you might make these flights less shattering.

- 1.a. Thank You
- 2.e. Public Involvement Process
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation

Petaluma, CA 94952

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN\\_122916--2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO--Letter--102214--23--USN_122916--2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piece-mealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piece-mealed 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.c. Segmentation and Connected Actions
- 11.d. Per- and Polyfluoroalkyl Substances
- 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
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.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
- 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
- 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 imp acts 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--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.

1.a. Thank You

Saanich / Victoria, British Columbia V8R 3G7

We wish to complain about the rumbling noises we hear when your planes are taking off on over cast days. We would NOT like to hear an increased amount as planned.

## 1.a. Thank You

Oak Harbor, WA 98277

I have lived in Oak Harbor for over 24 years. There were far more jets stationed here at that time. Of course, the OLF was much busier at that time too. Jets are loud. Not a good idea to live near a practice field if you can't tolerate the noise. It is not realistic to expect the Navy (read taxpayers) to move a base at great expense so that a few people (mostly retirees) can live without noise. Rest assured, the vast majority of people on the island support the base and the economic and social benefits it provides to the area.

Oak Harbor, WA 98277

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Have lived here since 1992. Number of jets was higher much higher then. OLF operations much higher also. People who own property near the OLF are well aware of the noise issues. Nothing new there. Number of people who would be affected is much higher in Oak Harbor and yet they aren't complaining. Hoping for a 80% OLF/ 20% Oak Harbor operations split. In that way, the fewest number of people would be affected by any increased noise from additional airplanes.

1.a. Thank You

Oak Harbor, WA 98277

My husband and I fully support the Growler Operations. We live 2 miles from NAS.

**Comments on U.S. Navy Draft Environmental Impact Statement for EA-18G "Growler"**  
**Airfield Operations at Naval Air Station(NAS) Whidbey Island Complex**

January 24th, 2017

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

Attention: EA-18G Growler EIS Project Manager

I am very disappointed that the Navy chose to base their latest DEIS on volume (1500 pages) rather than quality of information. Old information and data has been intermixed with current documentation. Conclusions have been presented based on out of date computer models using metrics that do not represent our Growler noise experience. The effect of low frequency noise produced by the Growler GE F414 series engines is mostly ignored. My comments follow below, and I hope they will assist in correcting the defects in this Draft EIS.

**1. Noise Metrics & Modeling, 3.2.2** The computer modeling program used for this EIS is **NOISEMAP Version 7.2** developed by Wyle Laboratories. This version is more than 10 years 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. A SERDP project in 2010 led by Principal Investigator Dr. Kenneth Plotkin of Wyle, stated in the project summary 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."

**RECOMMENDATION: Remodel the noise level simulation using the more recent Advanced Acoustic Model that more accurately reflects the noise levels San Juan County experiences from Growler flyovers.**

- 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.f. Use of Public Comments
- 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.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

**2. Noise Metrics and Modeling 3.2.2** Aircraft noise levels represented in the draft EIS are generated by a computer model and not **actual noise measurements** at Ault Field or OLF Coupeville. It states that the computer model draws from a library of actual noise measurements in 4.2. But, there is no documentation on whether actual Growler noise measurements were used. Also, conditions for the measurements, such as engine power, afterburners, distance, orientation, cloud cover, landing gear position, etc are not specified. Any conclusions drawn from these non-specific modeled noise levels cannot be valued, especially if these modeled noise levels have not been checked against actual noise measurements on the ground.

**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. Day-Night Average Sound Level (DNL) 3.2.2.1** The predominant metric used in the draft EIS, the **Day-Night Noise Level (DNL)**, is the energy-averaged sound level measured over a 24-hour period. An FAA study in 2011 "Technical Support for Day/Night Average Sound Level (DNL) Replacement Metric Research" found that DNL does not work particularly well as a predictor of aircraft noise impacts on residents.

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 are intermittent in a region with **very low background noise** (The nearest major international airport in Vancouver BC is 45 miles away, and the nearest Freeway I-5 is over 20 miles away). 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 (4.2). In actual experience these events are concentrated into some number of days in a year. This is not addressed in the Draft EIS analysis. The AAD values presented underestimate the impact on residents tremendously.

Actual data can be used to demonstrate this. Figure 4.1 (Appendix) 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. Figure 4.2 (Appendix) 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.**

**4. Noise Associated with Aircraft Operations. 3.2.** 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 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 Section 4, pg-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." Section 4, pg-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".

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).**

**5. Other Noise Reports 1.9.5** 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 (Appendix). 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 making decisions. Noise reports can also help to understand the benefits of mitigation measures. <http://sjcgis.org/aircraft-noise-reporting/> 01/13/17 [www.QuietSkies.info](http://www.QuietSkies.info) 6

Also not included is an independent noise study by JGL Acoustics in 2013 to obtain actual on-site Growler noise data at Outlying Field Coupeville. The Draft EIS instead dismissed this study based on a broad assertion that it had methodological flaws that made it unreliable. Since this study contains some of the only data actually measured instead of modeled, it should absolutely be considered as important to verify the conclusions presented in the Draft EIS.

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

**6. Noise Mitigation. 1 - pg 20.** 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 in Section 3, pg-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 noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

**7. Non Auditory Health Effects. Section 3, pg-22.** The Draft EIS 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](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.**

**8. San Juan Islands 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."

It would seem that legally, this only has the effect of clarifying that the creation of the National Monument does not place any **additional burden** on the Navy to justify its operations in the vicinity. The 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 Section 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 Section 3, pg-34).

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

**9. Socioeconomics, Affected Environment. 3.10.2** The Draft only examines socioeconomic impacts on Island and Skagit Counties. 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. Airspace and Airfield Operations, Affected Environment. 3.1.2.** Figure 3.1-3 diagrams Aircraft Arrival and Departure Flight Tracks at NASWI. However, I live in a 55 home development on the east shore of Fisherman Bay, 4 miles beyond your most outer flight path shown, and I experience aircraft that circle my home. There are multiple low level flyovers during periods of the day, occurring several days in a week as in areas closer to the south end of Lopez Island.

My home is close to Lopez Village where there is elderly housing, the Lopez medical clinic, our Library, businesses including the BLM and Kwiahrt offices. Lopez school is nearby.

It is very apparent that your modeled flight tracks in this diagram do not reflect your actual flight paths as experienced by Lopez residents. Figure 3.1-3 is misleading and should not be accepted as an accurate predictor of the areas affected by the Growler flights noise.

**RECOMMENDATION: Aircraft flight path diagrams should be verified by actual flight coordinates and ground site confirmation before they can be considered accurate enough to make decisions about affected areas.**

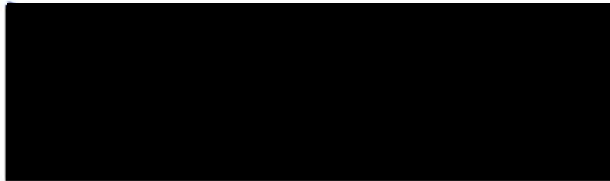
**11. Expand the Alternatives.** The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing. In 2014 the Department of Defense successfully demonstrated carrier takeoff, landing, and formation flying capabilities of the X-47B prototype ("drone") that is part of the Unmanned Carrier-Launched Airborne Surveillance and Strike (UCLASS) program.

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.**

**12. Summary.** I find the submitted Draft EIS inaccurate, flawed, and deficient in so many areas that it cannot be relied on for meaningful analysis. The only remedy is to address and correct the deficiencies outlined and offer further opportunity for public comment.



Lopez Island, WA 98261

References:

- 1) [www.quietskies.info](http://www.quietskies.info)
- 2) [www.whidbeys.com/publicinvolvement.aspx](http://www.whidbeys.com/publicinvolvement.aspx)
- 3) <http://sjcgis/aircraft-noise-reporting/>
- 4) <http://citizensofeyebysreserve.com/references/files/JGLNoiseReport.pdf>

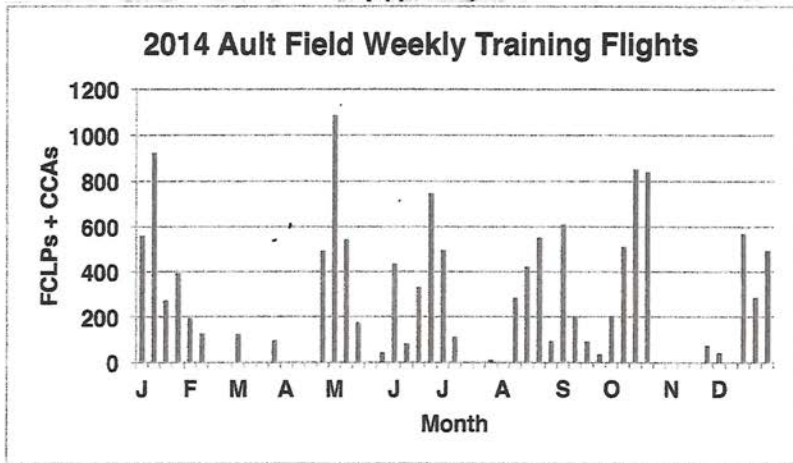


Figure 4.1

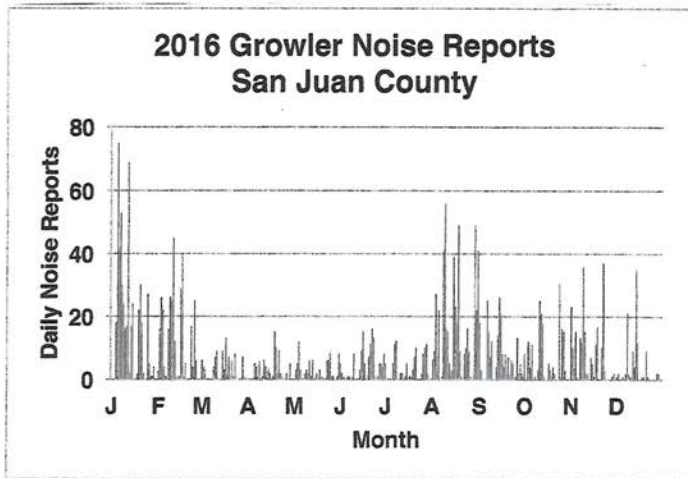


Figure 4.2

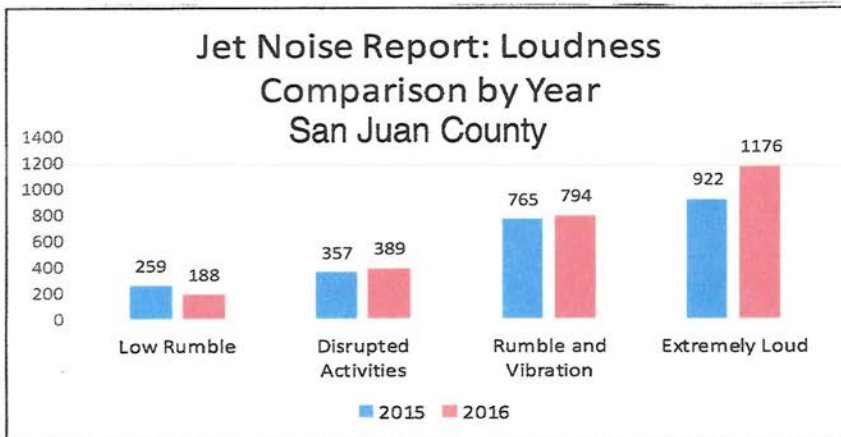


Figure 6.1

## 1.a. Thank You

Anacortes, WA 98221

OLF Coupeville continues to provide essential training for our Navy personnel preparing to get underway on deployment and conduct carrier & ship-board operations. The continual complaining from a VERY small minority of island inhabitants over a military presence that has been part of the local communities since the 1940s continues to undermine the readiness of our young Pilots and Naval Flight Officers. I moved to this area in 2009 and later purchased a house, fully aware of what I "was getting into," and chose my locale accordingly. The noise, however sporadic, is a small price to pay to know that our aircrew are getting the best training possible to maintain currency requirements and stay safe while underway. There is simply no where else appropriate from a fiscally responsible or pragmatic perspective to reasonably expect these training evolutions to be carried out. Those spearheading the movement to relocate the US Navy EA-18G, close OLF Coupeville or otherwise shut down flight operations both at NAS Whidbey Island, WA and OLF Coupeville are the last people qualified to make recommendations on how, how often, or where the Navy should conduct training. After the Environmental Impact Study found that exposure to the noises generated by sorties conducted around Coupeville and NAS Whidbey Island had no adverse effect on individuals' health, the case should be closed. We as Navy personnel should always take into consideration the needs, desires and concerns of the communities in and our us which we are a part of, but we should never sacrifice safe training and preparedness for baseless whining and litigation. Do the right thing - expand OLF Coupeville operations to levels that sustain VAQ readiness.



Mercer Island, WA 98040

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted

I urge you to consider the impact of noise, exhaust fumes, and carbon emissions for this project. Thank you.

Coupeville, WA 98239

WRT the proposed FCLP's at OLF Coupeville, I am in favor of Scenario C: 20% OLF/80% Ault Fld FCLP Ops. Any increase of Growler's/Hornets stationed at NAS Whideby increases the chance of a mishap involving loss of life/property. Navy/USMC losses of this airframe are at six this year.

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Anacortes, WA 98221

- 1.a. Thank You
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated

With the EA-18G Growler being one of the most accident-prone military airframes, an off-Whidbey site needs to be considered for flight carrier landing practice. NOT near Coupeville, nor Admiral's Cove. Potential crashes as well as medical risks are considerations. Perhaps requiring ALL staff associated with the operation to live near the take off/landing areas of the OLFC will convince the Navy of the need to relocate the field. (Housing is cheap, one hears, as properties have been devalued by the noise, and environmental impacts of the planes.) Thank you for your consideration.

Anacortes, WA 98221

1.a. Thank You

2.n. Alternatives Considered But Eliminated

From both living in Anacortes, WA for 28 years and from commuting to the hospital in Coupeville, WA for 25 years, I can attest to first and second hand accounts of the impact of the Navy planes on health, property values, risk of crashes (plane AND car as drivers pull over to gawk at low flying aircraft). Please consider a much less populated location than Whidbey Island for flight carrier landing practice. Thank you.

Anacortes, WA 98221

30,000 unsettled acres are normally used by the Navy to conduct a training program similar to the one on Whidbey Island; on Whidbey Island 700 acres are used (with acknowledgement this is due in part to local government permission. It is simply unsafe on so many levels: health, risk of crashes, effect on environment. A more appropriate site needs to be found.

- 1.a. Thank You
- 1.d. General Project Concerns
- 2.k. Range of Alternatives

Anacortes, WA 98221

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Please don't use the argument "we were here first" relative to the Outlying Field Coupeville. The use of the OLFC as an "emergency landing strip" was expanded greatly in the 1960's, long after the town of Coupeville (the oldest in Washington State) and Admiral Cove development were established. The use of the OLFC is inappropriate given the population density and proximity. Please consider relocation to an area with fewer safety and health risks for the surrounding populations. Thank you.

Anacortes, WA 98221

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

Growlers flying "touch and go's" off the Coupeville Landing Field are not "The Sound of Freedom." Rather they are the sound of environmental degradation, compromised health, and risk of aircraft accidents. It is time to decommission the OLFC and relocate the training.

Anacortes, WA 98221

Routine health monitoring, prevention training, mandatory use of devices for hearing protection are all expected for Navy personnel in "hazardous noise areas." While some of these measures are reasonable to offer residents living around the OLFC and in the flight path of the Growlers, one wonders, for example, how disruptive it is to wear hearing protection at home or to leave home during the hours of OLFC use? Neither seems to be a reasonable option. The OLFC needs to be decommissioned and relocated. Thank you.

- 1.a. Thank You
- 12.k. Compensation to Citizens for Private Property
- 2.k. Range of Alternatives
- 4.q. Potential Hearing Loss



Anacortes, WA 98221

Ebey's Landing National Historical Reserve is a unique, remarkable sanctuary. To have Growlers flying overhead threatens that. An alternative location for flight carrier landing practice is strongly urged.

1.a. Thank You

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

ANacortes, WA 98221

1.a. Thank You

2.n. Alternatives Considered But Eliminated

The density altitude of OLFC is around 350 feet. The most likely environment these Growlers will be flying is 2000-2500 feet. OLFC is NOT a good simulation of the environment to which the planes and pilots will be deployed. Bottom line: a more suitable alternative to Whidbey Island needs to be found. Thank you.

Anacortes, WA 98221

Current medical literature reveals findings different than those cited in the Draft EIS, relative to hearing/noise tolerances. The Navy planes flying over Whidbey, Fidalgo and the San Juan's are deafening. We've heard them until 0045 at times. Residents living closer than we, have recorded noise levels of 114 dB. They are more than a nuisance or mere disturbance of one's sleep! Please consider a move of the practice landing fields to a less populated area.

1.a. Thank You  
4.m. Supplemental Metrics  
4.q. Potential Hearing Loss

greenbank, WA 98253

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

I fully support the mission and work of the US Navy at NAS Whidbey Island. However, increases in flight activity beyond the current level will have adverse effects on the people of central Whidbey, and on the environment. The current level of activity can be managed, but a six-fold increase cannot. Please consider other options to maintain this vital US Navy mission.



# Public Meeting Comment Form

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

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

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

1. Name [REDACTED]

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

3. Address [REDACTED] 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

In your project overview you state the reason for the proliferation of the Growler is to counter advanced threats - who bombs who? WE BOMB THEM - 15 year wars of constant killing led by the US - who is the threat follow the money - we sell the planes we sell the guns the US makes \$\$\$ FROM WAR - IT IS FEAR MONGERING - the children of Coupeville are suffering the attacks of our military! Close the OLF field 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
- 2.a. Purpose and Need
- 4.r. Nonauditory Health Effects



# Public Meeting Comment Form

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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 husband has been living across from  
the OLF Field for 50 years. He has  
19 out of 20 symptoms of damage to his  
health, body & mind - HE HAS CANCER, PARANOIA,  
HYPERACTIVITY, PANIC ATTACKS, NERVE DAMAGE,  
& BRAIN DAMAGE - etc etc etc.  
AS A GRANDMOTHER I AM TERRIFIED FOR  
THE SCHOOL CHILDREN & ANIMALS WHO LIVE  
UNDER THE GROWLER -  
THE GROWLER WAS BAD ENOUGH

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

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.

But WE ARE THE TERRORISTS

quit your military if you have  
A HEART

Close

The OLF Field

SAVE Historic Couperville  
FROM Destruction!

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

Please print

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

Naval Facilities Engineering Command Atlantic

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

**YOUR INPUT MATTERS**

February 23, 2017

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

Dear Sir/Madam,

Please accept and address the following comments regarding the EA-18G Growler EIS. As detailed below, the Navy has clearly failed to address the significant and substantial environmental impacts of EA-18G Growlers on and surrounding Whidbey Island, the San Juan Islands, and the Olympic Peninsula.

It is completely disheartening to feel that the Navy seems to consider itself above the law and has so little regard for the citizens it is supposedly training to protect. I thought you were fighting for US! We are already suffering significant impacts to our quality of life as a result of the EA-18G Growler activities and the proposed changes to operations can only be viewed as a threat to everything that I hold dear. Therefore, I respectfully request that a full, complete, and comprehensive EIS be conducted – one that honestly addresses the true impacts to the citizens, wildlife, and economies of all communities over which these jets fly, including 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](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;

- 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.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
- 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



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 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.

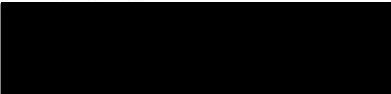
**25. Impacts to wildlife have been piecemealed:** It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from 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.

Thank you for considering these comments.

Sincerely,

  
Port Angeles, WA 98362



# Public Meeting Comment Form

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

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

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

1. Name

2. Organization/Affiliation

3. Address

4. E-mail

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

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

THANK YOU NAS WHIDBEY ISLANDS FOR  
 ALL THE SUPPORT YOU GIVE THE COMMUNITY

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

Clinton, WA 98236

1.a. Thank You  
12.c. Socioeconomic Impacts  
12.n. Quality of Life

Presence of Growlers at OLF is detrimental to the quality of life and economy of central Whidbey. OLF should be closed.



# 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 US Citizen

3. Address [REDACTED] Freeland WA 98449

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 people most affected by this abrupt increase in flights & noise increase are opposed to this. The people in support live further north & are out of range of the impact. Property values will (are) plummeting as the quality of our lives.

The increase of "up to two events" per hour during classroom hours - where teaching is interrupted is unacceptable in any community. This ~~is~~ increase is just ~~totally~~ wrong headed ~~that~~ please do not go forward with this.

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.j. Property Values
- 12.n. Quality of Life
- 4.o. Classroom Learning Interference



1.a. Thank You

Anacortes, WA 98221

A loved and treasured family home near Anacortes has been ruined by all the air base noise. The home has been in our family for 3 generations and now none of us can stand to be there. It's incredibly sad that this are is being ruined by noise from planes and jets from the base.

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

- 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

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.

Anacortes, WA 98221

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

Anacortes, WA 98221

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.

Anacortes, WA 98221

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.

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").



Clinton, WA 98260

1.a. Thank You

12.k. Compensation to Citizens for Private Property

At least one of the options puts the DNL65 contour on top of Whidbey Health's Coupeville Hospital. The hospital's new wing did not incorporate enhanced noise reduction, even though FAA PART 150 states that hospitals within DNL 65 must have some form of noise attenuation.

1.a. Thank You

Oak Harbor, WA 98277

NASWI is important to protecting our freedoms.

Victoria, British Columbia V9E 2B1

The Growler noises are very "unsettling" and sound like an earthquake. We live on a hillside in Victoria facing SE towards Whitby Island. Anything that can be done to reduce the noise would be 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.

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 Human Resident of Oly Pen

3. Address NA

4. E-mail NA

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 believe your computer generated EIS is accurate and does not reflect the actual impact on the ground to humans and wild life. The military to me is a corporate welfare cheat to defense contractors. This action does not truly reflect national security, national security begins at home by protecting the american people from harm of defense contractor

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**

start by leaving the peace of

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 2.a. Purpose and Need
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Give Peace a Chance

Coupeville, WA 98239

The environmental impacts of the following issues due to increased flight operations at the OLF Whidbey in Washington State 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. 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.

- 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

February 3, 2017

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

RE: **Draft EIS for EA-18 "Growler" Airfield operations at Naval Air Station  
 Whidbey Island complex**

Thank you for supplying the above EIS information. Although the document is very detailed and long, I am deeply disappointed that your "alternatives" **focus was** on ADDING 35 or 36 aircraft. You have not properly considered the effects of this battle-type aircraft noise on the people and wildlife in this area. At present, with 82 aircraft at NAS Whidbey, we here in the San Juan Islands experience extreme noise from the aircraft overhead and see some fuel dumps. When engines start up at Whidbey, the ground vibrates on South Lopez Island, and we can hear the rumble. When Growlers fly overhead here, the noise is deafening (not allowing conversation) Sometimes our windows vibrate. Some aircraft training at Whidbey is indeed necessary, but adding 36 more Growlers is NOT necessary and will damage our environment.

**Here are my objections to your EIS Draft:**

1. The Growler is known for its intense low-frequency engine rumble, but low-frequency impacts are ignored in the Draft.  
**Action: Evaluate Impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision-making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**

- 1.a. Thank You
- 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.f. Use of Public Comments
- 2.h. Next Steps
- 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.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 6.f. Fuel Dumping
- 7.h. San Juan Islands National Monument

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 conclusive.  
**Action: Recognize the health impacts of Growler noise on health as documentd 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) Natonal 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 extra Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity. They receive very 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 indentified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

**IMPORTANT NOTE:** Recently, it has been discovered that activity at NASWI and Coupeville, Washington has dangerously affected the water supply in those areas. Activities with the current 82 aircraft and equipment appear to have caused the contamination. Because of this new information, I believe there must be NO MORE AIRCRAFT stationed at Whidby Island, Washington.

Please carefully review ALL the COMMENT LETTERS you receive, **make all these corrections** in a better study of the impact on our environment. **Then provide us with a supplement for the EIS and let us see the information you discover.**

Sincerely,

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

Lopez Island, WA.



- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 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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- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

██████████  
 ██████████  
 Lopez Island, WA 98261

Feb. 1, 2017

EA-18-G EIS Project Manager

Naval Facilities Engineering Command (NAVFAC) Atlantic - Attn: Code EV21/SS

6506 Hampton Boulevard

Norfolk, VA 23508

**Comments on Draft Environmental Impact Statement for EA-18G Airfield Operations at NAS Whidbey.**

I wasn't expecting the Draft EIS to be a total fraud, but it contains no "real" alternatives or analyses of actual environmental "impacts" or effects. A few of the worst deficiencies are listed below.

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.

**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 non-conclusive.

**Action: Recognize the health impacts of Growler noise 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.

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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 are addressed, there is no commitment.

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

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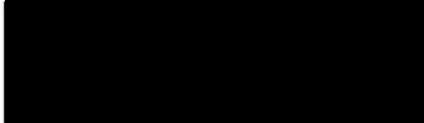
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Washington.

Please carefully review ALL the COMMENT LETTERS you receive, **make all these corrections** in a better study of the impact on our environment. **Then provide us with a supplement revising the Draft EIS.**

Sincerely,

A large black rectangular redaction box covering the signature area.

## 1.a. Thank You

Oak Harbor WA., WA 98277

Myself and a neighbor make almost all of our retirement income from renting homes located on acreages East of the base on Whidbey. We now rent only to active or retired Navy Members. All say than Whidbey is the BEST base in the world. It would be a shame if a small minority of profit seekers near the OLF could close the base and wipe out the economy of the entire region .... not just North Whidbey. Some of the minority near OLF would make millions off of property they bought for a song many years ago. The tyranny of the minority should not be tolerated.

## 1.a. Thank You

Oak Harbor WA., WA 98277

Myself and a neighbor make almost all of our retirement income from renting homes located on acreages East of the base on Whidbey. We now rent only to active or retired Navy Members. All say than Whidbey is the BEST base in the world. It would be a shame if a small minority of profit seekers near the OLF could close the base and wipe out the economy of the entire region .... not just North Whidbey. Some of the minority near OLF would make millions off of property they bought for a song many years ago. The tyranny of the minority should not be tolerated.

Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
7.j. Impacts on Outdoor Sports

As a parent of a young child living Coupeville, and a registered dietitian working in public health, I make the following comments on the draft EIS: The impact on children is not adequately addressed in the DEIS. The EIS should fully consider the following: Coupeville School District and Oak Harbor School District have established Farm to School and school garden programs where students are provided outdoor, experiential-learning opportunities during regular school hours. (Coupeville Elementary School, Coupeville Middle School, Coupeville High School, Crescent View Elementary, and Olympic View Elementary). The noise modeling within the EIS does not include Coupeville Middle and High Schools, assumes that students are indoors during the school day, and does not account for the impact on learning for students who have outdoor classroom time. The USDA promotes school gardens to provide food for child nutrition programs, connect children to the source of their food and create hands-on interdisciplinary classrooms (1). School garden programs studied over the past 20 years have found that the outdoor experiential learning has a positive impact on students' grades, knowledge, attitudes, and behavior (2). At Coupeville Elementary School, every classroom has garden-based activities throughout the school year. Currently, when the planes are flying at OLF, the School Garden Coordinator must stop his instruction to wait for the planes to pass, and then resume. The impact of increased flights on outdoor classroom instruction is not adequately addressed in the DEIS. School Garden Fact Sheet. United States Department of Agriculture (USDA). Available at: [https://www.fns.usda.gov/sites/default/files/f2s/FactSheet\\_School\\_Gardens.pdf](https://www.fns.usda.gov/sites/default/files/f2s/FactSheet_School_Gardens.pdf)) Williams, D.R. & Dixon, P.S. (2013). Impact of garden-based learning on academic outcomes in schools: Synthesis of research between 1990 and 2010. Review of Educational Research 2013.

**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-Parent \_\_\_\_\_

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.d. Recreation and Wilderness Analysis and Study Area
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports



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

Additional Concerns:

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

Please include any additional comments and concerns here:

As a resident of Coupeville, my concerns about the growler expansion relate to my son, who is six months old. I do not think the DEIS adequately assesses the impact of noise on our schools (elementary and middle and high schools), recreation areas (State, national, County, and town parks), and water contamination, all of which will impact ~~my~~ negatively my son and the children of this community.

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

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

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



Seattle, WA 98199

1.a. Thank You

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

We must not continue sacrificing our natural heritage (nor our values) for the sake of  
'national security'.

Clinton, WA 98236

Concerns: The impact on marine and terrestrial wildlife. -Businesses, schools, hospital, and County and Town public government operations in the Coupeville area. -A decrease in tourism. -Health effects from noise and low-frequency sound.

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

Coupeville, WA 98239

- 1.a. Thank You
- 3.a. Aircraft Operations

I was told at a open house that the Navy "strives" to use Runway 14 50% of the time, not even close. Another excuse is the weather is a determining factor, which doesn't match up with your flying practices. It would be nice if our neighborhood(Admirals Cove), didn't have to carry the full burden of your practices!

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 Resident - part time  
4. City, State, ZIP [Redacted], 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
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

I have been out on the water and seen (and HEARD) jets fly by  
awfully low over Lopez Island. I dont understand why the jets  
can't practice out over the open ocean (nearby) instead of directly  
over where people live. I'm afraid that adding more Growlers  
will mean more flights over our quiet, peaceful islands.

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

EA-18G EIS Project Manager:

Please include the following comments for the official record for this draft EIS prepared by the Navy regarding the increase of and impacts by EA-18G Growler aircraft to NAS Whidbey Island.

1. In general, cumulative and direct impacts resulting in the increase of growlers to NAS Whidbey were considered but the INDIRECT impacts, which also must be considered, was weak. Indirect impacts to resources must be considered as is required by NEPA and NHPA. The APE is not large enough when considering indirect effects of increased personnel to Whidbey Island.
2. Why did the Navy announce that an additional 4000 people were moving to Whidbey Island to support the increase in Growler jets and larger consolidation of Navy operations in the region without going through the required NEPA process this growth will have both direct and indirect impacts on resources. In addition, it was a predecisional action which is illegal under NEPA and NHPA. This kind of action requires a public process which appears to have been circumvented. Purchasing more planes prior to completion of an EIS, or the intent to purchase more planes prior to the completion of an EIS, is, again, predecisional.

Whidbey Island is physically limited by its size, configuration and natural resources including water availability and suitable soils that drain. The indirect effects of increasing the population on Whidbey island is profound and needs additional evaluation than what is provided here. Unintended consequences of new development to accommodate this population growth needs further assessment and evaluation. Again, the APE is not large enough.

Average sound decibel is not a helpful nor realistic measure for Whidbey island residents who experience the ear-shattering noise of the jets, particularly in the Coupeville area. This is a public health issue for children, the elderly, and those disadvantaged and/or disabled who cannot speak for themselves.

3. Executive Summary, Cultural Resources: this section does not mention OLF being adjacent to Ebey's Landing National Historical Reserve (EBLA) which is significant as a cultural landscape. The open, undeveloped nature of Smith Prairie, in which the OLF is situated, is a character-defining feature of EBLA's historic prairies. The Navy must take cultural landscape resources and

- 1.a. Thank You
- 14.a. Transportation Impacts
- 14.b. Vehicle Collisions and Safety
- 14.c. Pedestrians, Bicycles, and Bus Stops
- 15.b. Potable Water and Wastewater Capacity
- 15.d. Septic
- 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.d. Program of Record for Buying Growler Aircraft
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.e. Outlying Landing Field Coupeville and Coupeville History
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve
- 8.g. Mapping and location of Ebey's Landing National Historical Reserve and Central Whidbey Island Historic District

attributes into consideration when evaluating impacts to cultural resources in the Alternatives. This is different from considering impacts to archeological or architectural resources as it considers impacts to settlement patterns, land use patterns, small-scale features (among others) as well as built resources. Property boundaries are not evident to the visitor to Whidbey Island. One sees long views across prairies, woodlands, agricultural fields, historic and other buildings, roads, etc. but no differentiation is made between where Navy property stops and starts. This is the importance of evaluating the cultural landscape of the Reserve at the landscape (not property boundary) level.

4. Page 9 of the executive summary: Traffic backing onto Highway 20 headed south to Whidbey island is already causing dangerous situations on the highway. Cars are waiting to turn southbound while on a severely slanted ditch. Transit would be adversely impacted by this increased traffic further delaying residents who rely on public transit to get to/from work and home. Another example of indirect effects of bringing in more planes and personnel.
5. Island County already has limitations on its infrastructure. Not every land parcel perks for septic. More housing is needed, requiring roads, water/sewer lines. How will sewage be dealt with? Significant impacts ARE expected with the increase of growlers and the lack of planning for this anticipated growth. To make a statement to the contrary reflects a profound ignorance of what is happening on the island at the present with regard to traffic, road congestion, lack of affordable and safe housing for navy personnel, health issues for children due to noise, negative impacts for tourism, among other issues. Indirect effects of bringing in more planes and personnel.
6. Figure 3.2-5: this and all figures for OLF should identify its location adjacent to EBLA and flight patterns that take loud places over a unit of the National Park System (see Figure 3.3-3 for example)
7. Page 3-63, last paragraph: this is the first time EBLA is mentioned. It should be noted early on in document that the OLF is adjacent to a unit of our national park system. EBLA should be included in the list of acronyms.
8. Figure 3.5-3: EBLA referred to as a Reservation on map. It is a Reserve, not a Reservation. Ebey's Landing State Park and Fort Ebey State Park should be added to map in Figure 3.5-3. National park Service and other park boundaries are confusing on this map. Make NPS/EBLA boundary a different color for border?
9. Page 3-74: EBLA actually wraps around Penn Cove and is on the north, west, and south of the cove. It is significant as a cultural landscape that reflects a 19<sup>th</sup> century historic character still evident in the land and its historical patterns of settlement and use.
10. Page 3-80: Make it clear to reader that the Central Whidbey Island Historic District and EBLA share the same boundaries. First district dates to 1973. Congress took the boundaries for that district and made it a unit of the NPS in 1978 with the same boundaries. Add EBLA name to map.



11. Page 3-84: Navy is required by law, the NHPA, to know what resources it may be impacting. Therefore it must do a DOE for the Keystone Road Historic Site (Site 45-IS-316) and also do a DOE for the historic white farmhouse across from the OLF, as this house may be directly, and indirectly, impacted by operations.
12. Page 4-167: Navy states EBLA planning documents do not have influence over the operations at the OLF. This is irrelevant. The Navy must follow the process for NEPA and NHPA to determine what impacts direct and indirect its actions will have on resources. To suggest increased flights over the historic prairie with louder jets "may indirectly impact management of the NHR by degrading overall visitor experience" is an understatement. It will have a direct impact on a visitor's enjoyment, especially when considering a visitor has expectations of experiencing a 19<sup>th</sup> century landscape, not a modern day military operation.
13. Page 4-191: To play up EBLA's military history and how these jets speak to that history is disingenuous at best and pathetic, actually. The Reserve is significant for the historic landscape and its settlement and development patterns which indeed include remnants of a 19<sup>th</sup> century fort, a much quieter installation historically and present day. Visitors have an expectation of going back in time, not subjected to noisy aircraft from above which speaks to a modern era. Earlier in the EIS the Navy noted there was no historical significance to the OLF after a thorough evaluation for its National Register eligibility. The Navy cannot have it both ways. The impacts to the soundscape are profound and not in keeping with the character of the 19<sup>th</sup> century landscape Congress set aside to preserve and protect.
14. Page 4-192, 2<sup>nd</sup> paragraph: the statement about "...a consistent military presence within the reserve...": The cultural landscape is not mentioned only the historic architectural resources being a distance from the airfield. The open, undeveloped nature of Smith Prairie, one of 3 historic agricultural prairies in the Reserve, is directly impacted by increased operations of the Navy. This affects visual aesthetics as well as soundscapes of the historic areas and is more than a minimal to moderate impact. The low flights over town further degraded both the residents' and visitors enjoyment of being in the Reserve and having a sense of the history that exists here. Increased flights with louder jets will further degrade a sense of history in this landscape.
15. Page 4-195: I disagree with the closing statement that no significant impacts, direct or indirect, would result to cultural resources. The incessant flying of loud jets over a historic cultural landscape is a direct impact to the Reserve and people's enjoyment of it.
16. Page 6-13: Navy is downplaying that visitor enjoyment won't be diminished by aircraft noise by making EBLA seem like any old park. It is different. It is the first one of its kind in the nation. History rules here and there are expectations of seeing a historic place and landscape which speaks to the 19<sup>th</sup> century and only minimally marked by modern day intrusions. The increase in these loud jets at OLF will have significant effects on a visitor's enjoyment

and understanding of the landscape, since so much depends upon the visitor viewing the Reserve from key vantage points overlooking the prairies (and this is where the planes fly).



Freeland, WA 98249  
(former Coupeville resident)

Freeland, WA 98249

1. In general, cumulative and direct impacts resulting in the increase of growlers to NAS Whidbey were considered but the INDIRECT impacts, which also must be considered, was weak. Indirect impacts to resources must be considered and is required by NEPA and NHPA. 2. Why did the Navy announce that an additional 4000 people were moving to Whidbey Island to support the increase in Growler jets and larger consolidation of Navy operations in the region without going through the required NEPA process? This growth will have both direct and indirect impacts on resources. In addition, it was a predecisional action which is illegal under NEPA and NHPA. This kind of action requires a public process which appears to have been circumvented. Purchasing more planes prior to completion of an EIS, or the intent to purchase more planes prior to the completion of an EIS, is, again, predecisional. Whidbey Island is physically limited by its size, configuration and natural resources including water availability and suitable soils that drain. The indirect effects of increasing the population on Whidbey island is profound and needs additional evaluation than what is provided here. Unintended consequences of new development to accommodate this population growth needs further assessment and evaluation. In other words, your APE is not large enough. Average sound decibel is not a helpful nor realistic measure for Whidbey island residents who experience the ear-shattering noise of the jets, particularly in the Coupeville area. This is a public health issue for children, the elderly, and those disadvantaged and/or disabled who cannot speak for themselves. 3. Executive Summary, Cultural Resources: this section does not mention OLF being adjacent to Ebey's Landing National Historical Reserve (EBLA) which is significant as a cultural landscape. The open, undeveloped nature of Smith Prairie, in which the OLF is situated, is a character-defining feature of EBLA's historic prairies. The Navy must take cultural landscape resources and attributes into consideration when evaluating impacts to cultural resources in the Alternatives. This is different from considering impacts to archeological or architectural resources as it considers impacts to settlement patterns, land use patterns, small-scale features (among others) as well as built resources. 4. Page 9 of the executive summary: Traffic backing onto Highway 20 headed south to Whidbey island is already causing dangerous situations on the highway. Cars are waiting to turn southbound while on a severely slanted ditch. Transit would be adversely impacted by this increased traffic further delaying residents who rely on public transit to get to/from work and home. This is an example of an indirect impact that will occur by bringing more navy personnel and jets to the air station. Again, the APE is not large enough as noted in the draft EIS. 5. Island County already has limitations on its infrastructure. Not every land parcel perks for septic. More housing is needed, requiring roads, water/sewer lines. How will sewage be dealt with? Significant impacts ARE expected with the increase of growlers and the lack of planning for this anticipated growth. To make a statement to the contrary reflects a profound ignorance of what is happening on the island at the present with regard to traffic, road congestion, lack of affordable and safe housing for navy personnel, health issues for children due to noise, negative impacts for tourism, among other issues. 6. Figure 3.2-5: this and all figures for OLF should identify its location adjacent to EBLA and flight patterns that take loud places over a unit of the National Park System (see Figure 3.3-3 for example) 7. Page 3-63, last paragraph: this is the first time EBLA is mentioned. It should be noted early on in

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have significant effects on a visitor's enjoyment and understanding of the landscape, since so much depends upon the visitor viewing the Reserve from key vantage points overlooking the prairies (and this is where the planes fly).



# Public Meeting Comment Form

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

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

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

1. Name [REDACTED]
2. Organization/Affiliation \_\_\_\_\_
3. Address [REDACTED] ANACORTES WA 98221
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

This format for public input is very disappointing. I want to hear what others in my community have to say on this proposed operation, and hear real questions & answers in a public forum. This feels like a giant p.r. effort - and effective on that level contained. Please consider a real, open public discussion.

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.e. Public Involvement Process

## COMMENTS FOR DRAFT EIS/re: NAVAL AIR STATION INCREASE IN GROWLER OPERATIONS

FROM:

  
Anacortes, WA 98221  


## FOR YOUR CONSIDERATION:

As a long-time resident of Anacortes, I am concerned about any increase in Growler noise for multiple reasons.

1. The noise already interrupts my conversations, both indoors and outdoors, and puts a stop to my concentration as a writer. More noise, more often will drastically lower my quality of life, and the quality of my work.
2. More noise, more often will also affect the value of my property.
3. The Navy has acknowledged that the noise already affects students' cognitive functioning (e.g. reducing flights during exam times). What will happen in classrooms when noise frequency and volume increases? How can the Navy proceed without investigating?
4. The Navy has acknowledged short-term changes in animal behavior due to the noise, but says animals have become 'habituated.' Have they? There are no studies to show that, or to project what an increase in noise frequency and volume will mean to long-term species survival. What will happen to our resident southern killer whales, already bombarded by underwater sonic? Again, how can the Navy proceed without such data?

I do not understand why the Navy cannot take these operations to an under-populated area to minimize impact on both humans and animals. If the answer is expense, consider the years of litigation, and demand for new impact studies that Alternatives 1-3 are bound to spark.

I remember the first year I moved to Anacortes, when I took my toddler daughter outside to play and the Prowlers came over, ripping the sky. She burst into tears and could not be consoled. What will the toddlers of the future face if this proposal proceeds?

Thank you,  


- 1.a. Thank You
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.m. Impacts to Marine Species and Habitat
- 12.j. Property Values
- 2.n. Alternatives Considered But Eliminated
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

1.a. Thank You  
5.a. Accident Potential Zones

I am alarmed at the possible increased Crash Zone and it's consequences.



1.a. Thank You

Coupeville, WA 98239

I am concerned about the planned increase of Growers to OLF Whidbey because of the noise level that affects all of us in Central Whidbey and beyond

Coupeville, WA 98239

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

I wish the Navy would find alternative sites for landing practices for the Growlers

Coupeville, WA 98239

Having all the Growlers on Whidbey Island is like having most of the Navy fleet at Pearl Harbor on 12/7/41

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

Coupeville, WA 98239

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 7.j. Impacts on Outdoor Sports

Of great concern is the proven affect of learning due to the jet noise. Coupeville elementary, middle, and high schools are within the path of the OLF. There are many activities happening on the school grounds as well.

Coupeville, WA 98239

1.a. Thank You  
12.e. Agriculture Analysis

Our farmers suffer from the jet noise. It is impossible to be outside working the fields during the flights.

Coupeville, WA 98239

1.a. Thank You

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

Ebey's Landing National Historical Reserve will be greatly...and negatively...impacted  
by an increase of jets at OLF.

1.a. Thank You  
12.h. Tourism

Coupeville, WA 98239

Tourism is a major factor in Coupeville. We are the second oldest town in the state. How can we possibly invite people to our community with the increased flights over our town?

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

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

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

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

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

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

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.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:**

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

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

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

## RESPONSE to Navy EIS

I'm writing about the proposed and potential increased flights over OLF Coupeville. I've lived in Coupeville for 40 years and have been deeply involved in the history of our second oldest town in WA State. I am the author of [REDACTED] the sales of which benefit the Island County Historical Society. I have interviewed well over 100 people about the history of Front Street and Central Whidbey. I have supported and worked for the Ebey's Landing National Historical Reserve.

I am not a proponent of closing NAS Whidbey. However, because all we have worked for in Central Whidbey is in jeopardy with the increase of jet noise, I'd like to offer a couple of suggestions to reduce or eliminate the use of the OLF.

I understand the touch-and-go's are currently being held Lemoore, CA. Can they continue that activity?

OR there is property that potentially could be used for a touch-and-go landing field just north of Oak Harbor and near NAS. The Dugualla Farm has been closed to produce sales. It seems to me that would be a perfect location, and you would be within your area of Navy support.

Coupeville and Oak Harbor share the Whidbey communities in entirely different ways. Let's keep it like that and live in harmony.

[REDACTED]  
[REDACTED]



- 1.a. Thank You
- 2.e. Public Involvement Process

Port Townsend, WA 98368

I am concerned the United States Navy will irreversibly damage the livability of the Olympic Peninsula with the massive increase of Growler jets. This militaristic and expansionist attitude does not adequately take into account long term risks of such investments and contributes towards general disrespect of our nation's military for not truly listening to the public. The style of "hearings" the Navy is conducting is a PR game to placate and distract the people. It does not constitute actual listening to the concerns of the communities established in this region. Please reconsider this massive expansion of Growler jets above what is clearly a sacred land and a public commons. We should behave as guests on this land, and destroying the peace and quiet of an entire landscape is a slap in the face of the home we inhabit. Thank you for your consideration, [REDACTED]

- 1.a. Thank You
- 12.n. Quality of Life
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects

The noise is painful. From the moment I open my eyes I hear the rumble begin. I have to shout to talk to my husband - inches away.

It is stressful.

To make a phone call I have to go in a back room with the door shut.

The noise is deafening.

It needs to stop for the health of those living near and the environment. How can you evaluate the impact on my quality of life? Just listen - I will tell you - The quality of my life is negatively impacted by the noise from the blowers. It is painful, stressful and unacceptable. It must stop.



# Public Meeting Comment Form

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

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1. Name [REDACTED]

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

Too many flights planned!  
Too loud  
Only fly over Oak Harbor please

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.a. Aircraft Operations
- 4.t. Noise Mitigation



# Public Meeting Comment Form

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

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

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1. Name [REDACTED]

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

NHPA limit of EIS to 300 pages was not  
heeded w/ 1,500 page EIS  
Please give extension

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.c. Compliance with the National Environmental Policy Act

Coupeville, WA 98239

I am very worried about the potential for increased touch and go practice landings at the OLF. We bought our home in Admirals Cove during the period of 2014 (6 months) when there were few or no flights. We knew about the potential of some flights, but we did not know about the potential of increasing to over 30,000 in one year. Although we went to see the touch and go landings at the OLF, this noise was not as loud as what we experience right over our home. Being outdoors is excruciating and indoors is scary as well. The whole house shakes and the insides of my body vibrates as well. Ear coverings are needed. Please do not use the average decibel readings per year, month or day. Please use the actual decibels which can reach up to 130 - way over any healthy limit. Imagine living under this for hours a day. It's impossible. Also, please consider that there are many residents in the possible crash zone area leading to the olf. I believe there are no other Navy fields being used in this way, this close to potential civilian targets. Please reconsider the amount of these practices, or preferably move them to a more remote area that does not cause harm to fellow Americans. Thank you.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones



## 1.a. Thank You

Oak Harbor, WA 98277

There is no environmental problem. I have lived here since 1973. No one likes the noise, but bottom line-the Navy needs this area for training purposes. The people making these complaints are far less worried about noise than they are about pushing their anti military agenda. When you move into what is already a high volume noise area, it doesn't make sense to complain about it. Chose a noise-free area instead.

## 1.a. Thank You

Oak Harbor, WA 98277

There is no environmental problem. I have lived here since 1973. No one likes the noise, but bottom line-the Navy needs this area for training purposes. The people making these complaints are far less worried about noise than they are about pushing their anti military agenda. When you move into what is already a high volume noise area, it doesn't make sense to complain about it. Chose a noise-free area instead.

1.a. Thank You

Oak Harbor, WA 98277

Dear sir, Thank you for the services you and our Growlers provide our nation. Whidbey Island has an awesome environment. I live a quarter mile from the base and am blessed to have our anes fly directly overhead. Trees are still green. Sky is still blue. Freedom is still protected. Thanks to 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?

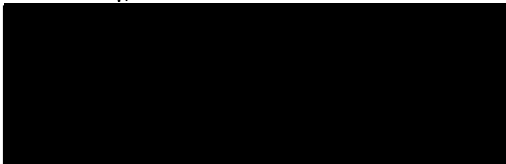
I also understand that a similar aircraft practices in Mountain Home Idaho AFB, home of the 366 Airforce wing. In fact, the 390th Electronic Combat Squadron, which I believe includes the Electronic Attack Squadron, located at Naval Air Station Whidbey Island, Wash., is assigned to the 366th Operations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



*Sequin 98382*

- 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

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

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

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

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

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

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)  
[REDACTED] *resident, citizen* \_\_\_\_\_
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](http://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
- 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

- 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: \_\_\_\_\_

\_\_\_\_\_  
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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~~ **February 25, 2017**  
*(DEIS comment period extended by 30 days from original date of Jan 25, 2017)*

██████████  
Coupeville, WA. 98239  
02/19/2017

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

Subject: Response to DEIS EA-18G Whidbey Island Complex

Dear Sir,

My wife and I have lived in Admirals Cove on Whidbey Island for nineteen years. Our home is located at ██████████ Dr. Coupeville. We will express our views of concerns not necessarily addressed in the Draft EIS document relating to sound power levels generated by EA-18G Growler aircraft. We request that you give our concerns serious consideration to abating the "Growler" sound power problems. Though our concerns are about the OLF area they would also apply to Ault Field.

Our house is located ██████████ of a point on the centerline ██████████ of the end of runway 14 at the OLF. The main floor of our house is at elevation +30 feet MSL. The elevation of the OLF runway is + 199 feet MSL. That locates our house 169 feet below the final approach to runway 32. We have not experienced any sound power problems with EA-18G aircraft when using runway 14 for FCLP. Our concerns only apply to EA-6B and EA-18G aircraft using OLF runway 32 for FCLP and the sound power level problems they generate attributed to operational use and conditions. For example, runway 32 has been used almost exclusively the past 4 years. On 3 occasions the wind was Southerly at 4-7 mph and the Growlers kept using runway 32. They did not shift to runway 14 as was done in the past by the Prowlers. Keeping the Growlers using runway 32 with a slight tailwind is not Field Carrier Landing Practice. It anything but FCLP. ( but still a necessary skill for land based landings). I consider the overuse of runway 32 to be an operational issue that will be solved.

We have observed that when using OLF runway 32 there are two types of pilots. We noticed this with the EA-6B Prowlers and now we see it again with the EA-18G Growlers. One type is the pilot new to the Growler that we call the "Rookie". The other type is the veteran pilot with lots of hours in type that we call the "Hot Dogger". This is especially true for squadrons newly returned from overseas deployment using the OLF.

There is not a sound power problem for us when a Growler is flying a standard pattern . The pilots are at good elevations on downwind, base, and final approach. These are the pilots we call the "Rookies" as they are learning and following the book. This is true for both day and night operations.

Our sound power problems using OLF runway 32 is with pilots returning from an overseas tour that are mostly "Hot Doggers". They are the ones causing the noise problems here. They fly downwind at 600 feet, not the standard 1100 feet, turn base and descend to about 200 feet as they are turning to final approach holding altitude with lots of power, producing high sound power levels above our roof, ██████████ of runway 32 centerline and ██████████ from touchdown. When this situation occurs we must wear protective headgear inside our house. When I am outside working in the yard I wear a Stihl chainsaw headset.

Most of the noise problem with the "Hot Doggers" occurs during daylight operations. At night (dark) they fly a standard pattern and are not a problem. We have had only two occurrences when a "Hot Dogger" buzzed our roof top in the dark, the same way as daylight. Those were two of the worst experiences with the sound power levels generated by an EA-18G Growler. This is an operational problem that is solveable. A little retraining of returning veteran pilots is required, when back in civilian airspace over a residential community, by a reduction of power settings and abiding to a standard landing pattern. It may become necessary to adopt a 115 DB sound pressure level that will not be exceeded over Admirals Cove.


I believe that the sound power levels of the EA-18G Growler can be reduced to more acceptable levels by various methods.

- 1.a. Thank You
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.a. General Noise Modeling
- 4.t. Noise Mitigation

The following is a list for consideration:

1. For Field Carrier Landing Practice at OLF fly a standard landing pattern at maximum elevations to allow for reduced power settings; downwind leg at 1200 feet, or more, base to final approach at 500 feet or more.
2. The use of runway 14 for half of all touch and go's for FCLP at the OLF.
3. Provide a training program for returning veteran pilots on better landing skills over civilian airspace at the OLF.
4. Continue to alert civilians, as currently done, to future planned operations at Ault Field and OLF.
5. Provide monitoring of landing operations at the OLF to maximize noise reduction while maintaining pilot proficiency. This can be accomplished by visual and audible means, electronic sensing, and measurement.
6. Consider an alternate site for the "Hot Doggers" to do their thing while the "Rookies" use the OLF. However it must be kept in mind that all "Rookies" will become "Hot Doggers" with each overseas deployment. Therefore, an aircraft carrier, such as the Kitty Hawk, may help at various times.
7. The number of OLF operations per year, should be limited to 6100 with a required 50-50 use of each runway over a year.
8. Limit the number of EA-18G Growlers in the OLF pattern to two at any one time. 2 aircraft for 2 hours is quieter than 4 aircraft for 1 hour.
9. If the above listed means or suggestions cannot achieve acceptable noise levels around the OLF then sound suppression will be required on each Growler using the OLF for FCLP. This may require Intake as well as Exhaust attenuation. These could be reserve aircraft equipped to provide OLF or Ault Field FCLP duty.

Thank you for the opportunity to respond to the draft EIS.





Coupeville, WA 98239-9739

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

1. For FCLP at OLF follow a standard landing pattern at maximum elevations to allow for reduced power settings. 2. The use of runway 14 half of all touch and go's. 3. Provide a training program for returning veteran pilots on better landing skills over civilian airspace to OLF. 4. Provide monitoring of landing operations at the OLF to maximize noise reduction while maintaining pilot proficiency. 5. Adopt by regulation, 115 DB sound pressure level maximum over Admirals Cove. 6. The number of OLF operations per year, should be limited to 6100 with a required 50-50 use of each runway over a years period. 7. Limit the number of Growlers in the OLF pattern to two at any one time. 2 aircraft for 2 hours is quiter than 4 aircraft for 1 hour. 8. If operational methods cannot achieve acceptable noise levels around the OLF then sound suppression will be required on each Growler using the OLF for FCLP. This may require intake as well as exhaust attenuation. These could be reserve aircraft equipped to provide OLF and Ault Field FCLP duty.

Coupeville, WA 98239-9739

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

1. For FCLP at OLF follow a standard landing pattern at maximum elevations to allow for reduced power settings. 2. The use of runway 14 half of all touch and go's. 3. Provide a training program for returning veteran pilots on better landing skills over civilian airspace to OLF. 4. Provide monitoring of landing operations at the OLF to maximize noise reduction while maintaining pilot proficiency. 5. Adopt by regulation, 115 DB sound pressure level maximum over Admirals Cove. 6. The number of OLF operations per year, should be limited to 6100 with a required 50-50 use of each runway over a years period. 7. Limit the number of Growlers in the OLF pattern to two at any one time. 2 aircraft for 2 hours is quiter than 4 aircraft for 1 hour. 8. If operational methods cannot achieve acceptable noise levels around the OLF then sound suppression will be required on each Growler using the OLF for FCLP. This may require intake as well as exhaust attenuation. These could be reserve aircraft equipped to provide OLF and Ault Field FCLP duty.

Coupeville, WA 98239-9739

- 1.a. Thank You
- 3.a. Aircraft Operations

1. For FCLP at OLF follow a standard landing pattern at maximum elevations to allow for reduced power settings. 2. The use of runway 14 half of all touch and go's. 3. Provide a training program for returning veteran pilots on better landing skills over civilian airspace to OLF

Port Townsend, WA 98368

Dear Project Manager, While I am proud of and understand the importance of our military operations, I am writing to express my concern about the Navy's current draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at NAS Whidbey Island Complex. This draft EIS is deficient in many respects, but most notable are: the use of outdated modeling for assessing Growler noise impacts and the failure to include all areas such as Port Townsend which will be affected by these flights. These proposed large increases in jet noise & total annual airfield operations will impact the health of all that live here. The many separated projects in our region (Growler buildup on Whidbey Island, a Port Angeles Harbor permanent base, electronic warfare games in the national forest abutting Olympic National Park, sonar buoy activity in the Olympic National Coast Sanctuary, seabee beach activities, and underwater munition warfare activities) must be bundled to present a more comprehensive EIS as well as a cumulative and long term impacts analysis. This is warranted to show need and to provide a much more accurate picture of our military's buildup/intentions around northwestern Washington. Sincerely, [REDACTED]

1.a. Thank You

1.c. Segmentation and Connected Actions

1.d. General Project Concerns

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

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

Victoria ? Oak Bay, British Columbia V8R 5Y9

I constantly hear the jets and would appreciate it if steps were taken to deal with the noise issue, especially since I live in another country.

Victoria, British Columbia V8S 4P7

I have lived in Victoria most of my life but recently moved to the Oak Bay area. I hear a rumble so deep and loud that it feels like my home is shaking, on such a regular basis. The rumbling happens at such regular intervals that I am sure it must be planes taking off rather than "misc. air traffic" as the US Navy (Brown) has suggested. This quiet, family area of Victoria is truly affected by the noise, which I should add seems to happen often late at night. Please consider noise reduction strategies to mitigate the impact you are having on your neighbours. Thanks so much!

1.a. Thank You

12.n. Quality of Life

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

4.t. Noise Mitigation

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 highly impacted individual

3. Address [Redacted] Lopez, 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](http://www.QuietSkies.info)

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

I support above comments  
[Redacted]

(Continue on the back)

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

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 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. 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 is optimistic. See graph on

<http://windowanddoor.com/article/04-april-2007/understanding-basics-sound-control>

RECOMMENDATION: Evaluate impacts of the Growler 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 it 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 Section 2 -

[http://media.wix.com/ugd/f9226a\\_739ee2aec38644ccaa362fd40c4c7605.pdf](http://media.wix.com/ugd/f9226a_739ee2aec38644ccaa362fd40c4c7605.pdf)

RECOMMENDATION: 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. 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 ..." 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

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



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\\_739ee2aec38644ccaa362fd40c4c7605.pdf](http://media.wix.com/ugd/f9226a_739ee2aec38644ccaa362fd40c4c7605.pdf)

RECOMMENDATION: Redo the noise level simulation using the more recent Advanced Acoustic Model. 4. The 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](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 for commercial airports with typical operations of 16 hours a day, 7 days a week. The noise experienced during Growler training flights is intermittent in a region with very low background noise. Looking at the San Juan County citizen jet noise reports for 2015 and 2016, there were 111 days a year with no noise reports and 239 days with 5 or fewer reports. For comparison, the noisiest day had 75 reports. The DNL metric would average the impact of 126 disruptive days (365 – 239) over the full year. Averaging noise in this manner assumes that the quiet days mitigate the noisy days. There are no studies to support that assumption. Averaging leads to an incorrect conclusion that San Juan County is not significantly impacted by Growler noise. Under all the Alternatives, Total Operations increase by 47% over the No Action Alternative (Table 2.3-1). The “startle factor” is recognized as cause of adverse health impacts that is not captured by the averaging inherent in the DNL metric. RECOMMENDATION: 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" Wayne (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](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. 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/> In 2013, Citizens of Ebey Reserve engaged an independent noise study by JGL Acoustics 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](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 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 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 documented. 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 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." 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. 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.

Freeland, WA 98249

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

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

1.a. Thank You

Friday Harbor , WA 98250

I am opposed to any increase in operations of the EA-18G "Growler" by NAS WHIDBEY ISLAND. I find the noise disturbance excessive already and do not support any increase for the negative effects it will have on health and environment.

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. 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.



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 noise contours depicted in the DEIS are misleading and false due to: 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

The DEIS claim that the JGL noise study was "flawed" is disingenuous and unsupported; actually the WYLE modeled noise levels haven't 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 didn't comply with the Nat'l Environmental Policy Act (NEPA): it failed to judiciously examine off-Whidbey Island sites for conducting flight carrier land practice (FCLP).

Langley, WA 98260

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

The DEIS misconstrued important finding of the Nat'l Park Service's 2015 noise study at Ebey's Landing Historic Natl 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 reprehensibly cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Langley, WA 98260

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


The Navy has adopted standards that protect its 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-hr. 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.")


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

January, 2017 Comments

Fill in and mail with comments to:


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

1. First Name 

2. Last Name 

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

4. City, State, ZIP LOPEZ ISLAND WA 98261

5. E-mail 

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

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

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

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

### January, 2017 Comments

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

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



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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

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Langley, WA 98260

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis disregarded fact that farm workers, gardeners, and recycle ctr. workers are mostly low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by the overhead Growler noise.

Sequim, WA 98382

Feb 24, 2017 To: EA-18G EIS Project Manager Naval Facilities Engineering Command Atlantic 6506 Hampton Blvd Norfolk, VA 23508 Attn: Code EV21/SS Dear Sir/Madam, I have several concerns with the Navy's Draft Environmental Impact Statement 2016-2017 (DEIS) for the EA-18G Growler airfield operations at NAS Whidbey Island Complex which are itemized below. 1. Noise from EA-18 Growlers is significantly affecting populated areas on the Olympic peninsula, Olympic National Forest, Olympic National Forest Wilderness Areas, and Olympic National Park far outside the vicinity of Naval Air Station Whidbey. I can personally attest to the frequent noise disturbances over my home in Sequim, WA and to sightings of Growlers overhead during hikes in both the Olympic National Forest and Olympic National Park. Yet, the Navy's DEIS only conducted noise analyses in the immediate vicinity of the runways at Ault Field and Outlying Field (OLF) Coupeville. By ignoring the noise generated by aircraft outside the study area, the DEIS is deficient in assessing the full impacts of flight operation. 2. The Area of Potential Effect from sound and vibration to cultural and historic sites was so narrowly defined that significant impacts to areas outside this area were not considered in the DEIS. The US Department of Housing and Urban Development classifies 65 decibel (dB) sound levels as "normally unacceptable" and above 75 dB as "unacceptable". EA-18G Growlers can produce up to 150 dB sound levels and residents in outlying areas have reported levels in excess of 75 dB. Failure to consider impacts of sound and vibration in all areas of flight operation in the DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. The DEIS only attempts to address the impact of 36 Growlers instead of considering the full impact of 118 Growlers (36 plus existing aircraft). For the Navy to conclude that adding 36 Growlers to its current fleet will have no significant impact is deceptive because collectively the impact of 118 Growlers is likely highly significant. The number of flights at OLF Coupeville alone is proposed to increase more than ten-fold from 3,200 to 35,100 in 2017. In the same way, in its 2014 Environmental Assessment (EA) the Navy only considered the effects of operating ground-based mobile emitters without addressing the full range of effects of emitters and engaged Growler aircraft. The Navy has consistently separated each proposal from its predecessors when considering impacts. This piecemeal approach does not accurately assess the total cumulative impacts to public health and safety, the physical environment, biological resources, climate change, cultural and historical sites and socioeconomics. The Navy has an obligation to consider the full range of impacts of proposed actions in its DEIS for the public to comment effectively and gain legal standing. 4. The DEIS does not analyze effects to groundwater and soil from the use of firefighting foam on its runways during Growler operations, despite acknowledging prior to the publication of the DEIS that contamination of properties adjoining runways had occurred. The Navy concludes in its DEIS that there is no significant impact related to the use of foam despite a projected 10-fold increase in flights from OLF Coupeville. A Department of Defense publication (<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&Material-Emerging-Risk-Alert-for-AFFF.pdf>) states that there is currently no technology that can treat soil or groundwater that has been contaminated with firefighting foam. The Navy needs to revise its current DEIS to include analyses of soil and groundwater contamination in areas adjacent to operation airfields and accept responsibility for affected residents. 5. The DEIS does not consider

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 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.h. Next Steps
- 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.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.l. Points of Interest
- 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

the potential impacts of down-directed electromagnetic radiation from Growlers interacting with ground-based emitters on humans or wildlife. 6. The Navy has announced that it does not intend to allow for a public comment period on the final EIS. If the Navy modifies the DEIS to address the public's numerous concerns in a final EIS, then federal law requires that a federal agency provide a supplement to a final EIS and allow the public to comment. 7. The three alternatives offered in the DEIS propose the same number of flights but differ in the percentage of flight activity at runways. Therefore, none of the alternatives reduces the total environmental impact of runway noise. This violates NEPA Section 1506.1, i.e., a proposed action that has an adverse environmental impact or that fails to offer reasonable mitigating alternatives should not be taken. Furthermore, the DEIS does not identify a preferred alternative as required by NEPA Section 1502.14(e). Aside from violating NEPA, this proposal makes it impossible for the public to evaluate and comment on impacts at each runway. 8. Noise from Growler activity was not evaluated in the current DEIS or in any other previous document submitted by the Navy for the Olympic Peninsula. 9. Actual noise measurements of in-flight Growler aircraft have not been made either around Whidbey Island airfields or in outlying areas including the military operations area of the western Olympic Peninsula. The Navy did conduct computer modeling for a 10-mile radius around the Whidbey Island airfields but did not conduct similar modeling in any other area affected by Growler activity. The Navy uses an unrealistic, outdated Day-Night Average Sound Level metric which averages jet noise with quiet periods over the course of a year to arrive at a 65 dB average. Because Growlers have afterburners capable of producing 150 dB sound levels, fly at various altitudes when engaged in aerial combat maneuvers and practice takeoffs and landings at Whidbey Island airfields, average sound levels will not assess the full scope of impacts of Growler noise. The Navy's noise analysis does not address impacts caused by sporadic peak noise or by low-frequency noise. Therefore, the Navy's claim that noise standards are not exceeded is highly suspect and cannot be extrapolated to the Olympic Peninsula where neither sound modeling nor actual sound measurements were made. The claim by the DEIS that wildlife is "presumably habituated" to noise is unrealistic. 10. The DEIS uses the term "event" to describe its activities without defining an "event". An "event" could consist of a single aircraft flight or multiple flights, involve one or more aircraft; the duration of an "event" could potentially last for seconds, minutes, or even days. Therefore, it is impossible to determine what the impact of proposed actions will be. 11. The possibility that the Navy could conduct flight operations on weekends was disclosed in the Forest Service Permit Appendix C, page 11 ([www.fs.usda.gov/project/?project=42759](http://www.fs.usda.gov/project/?project=42759)), i.e., "the permit holder (Navy) may request specific limited weekend activity 30 days in advance of desired use, which is at the sole discretion of the Forest Service to grant or deny". Weekend activity was not considered in previous EISs and notably not in the current DEIS. That both the Navy and the Forest Service would even consider weekend operations with its attendant adverse consequences on tourism and recreation without offering the opportunity for the public to comment is egregious. 12. The Navy has publicly stated that Growlers will fly at a minimum of 6000 feet above sea level. Yet, the DEIS states guidance from the Aircraft Environmental Support Office that allows for aircraft to overfly towns and populated areas by 1000 feet and sparsely populated areas by 500 feet. The noise impact from Growlers flying at such low altitudes would be overwhelming and raise serious health and safety concerns but was not even modeled or analyzed in the DEIS. A supplemental DEIS must be prepared to address these new concerns and a public comment period must be

provided. 13. No mitigation measures for Growler noise were identified for any of the three proposed alternatives. The Navy concedes that mitigation measures may be developed based on public comments received. This amounts to new information and therefore requires another public comment period. The Navy's proposal to not allow a comment period on the final EIS would be unlawful. 14. A discussion of impacts to wildlife are limited to areas adjacent to runways in the DEIS. An analysis of impacts to wildlife in areas where flight operations are occurring is totally lacking. Threatened and endangered species in critical habitat areas where overflights occur on the Olympic Peninsula are omitted. The DEIS ignored a 2016 literature survey on noise impacts to wildlife [Shannon G et al (2016) "A Synthesis of Two Decades of Research Documenting the Effects of Noise on Wildlife". Biological Review 91:982-1005] which concluded that terrestrial wildlife responses begin at 40 dB in favor of a dated 1988 synthesis of the literature. It also conveniently omitted in its discussion the pertinent publication by Engels S et al (2014) "Anthropogenic Electromagnetic Noise Disrupts Magnetic Compass Orientation in a Migratory Bird". Nature 509:353-356. Clearly, the Navy chose to select only references that supported their conclusions of no significant impact from noise to wildlife while avoiding references that undermined their conclusions. Thank you for the opportunity to submit these comments for your consideration. Sincerely, [REDACTED]





- 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:

My main concern is the constant noise that would result from increased flights. The Navy's noise ~~modeling~~ <sup>modelling</sup> averages does not accurately ~~measure~~ <sup>reflect</sup> the actual noise experienced <sup>in the adjacent</sup> as the Growler flies overhead. <sup>impacting personal, social + business communications</sup> Conversations stop if people do not go outdoors to garden while planes are flying because of the noise. This affects ~~any business being transacted in the flight path~~ <sup>the noise + the duration impacts</sup> as well as school classes at the senior middle school + elem. schools. Personally, the noise created as the growlers fly over rumbles inside me to my core. I would experience a nervous breakdown if I lived in the flight path <sup>to the increased flight projections</sup>. Regarding scenarios ABC.

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

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

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

*None of the above*  
*opt for*  
*no mc*  
*in flight*  
*at OLF*

Coupeville, WA 98239

I have many concerns about increasing the number of growler flights over Coupeville, with the noise level being the most concerning. The Navy's method of noise averaging does not accurately reflect the level of noise experienced by those in the flight path. The noise experienced "in the moment" of a flyover stops conversations cold, impacting personal, social and business conversations. I know people who do not go outside to garden because of the noise when the growlers are flying. The noise and the cognitive distraction also impacts classes at the elementary, middle and high schools. Personally, the noise created when the growlers fly over rumbles inside me to my core - a very unpleasant sensation. If I lived in the flight path, I am fairly certain I would have a nervous breakdown with any increase in flights. Regarding scenarios A, B, and C, I would opt for "None of the above", no increase in the number of flights at OLF.

- 1.a. Thank You
- 2.I. No Action Alternative
- 4.d. Day-Night Average Sound Level Metric
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area



Coupeville, WA 98239

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

My family and I live approximately 1.5 miles from OLF Coupeville. We purchased our house about 1.5 years ago, well aware of OLF and Navy airfield activities. The FCLP patterns at OLF occasionally bring aircraft low over our house, low enough to see the pilots in the cockpits, with noise levels that occasionally approach pain levels. According to your DNL maps, we currently are in the 65db area, and under any scenario we will be in the 75db area. I am not opposed to the Navy bringing the additional Growlers to NAS Whidbey. But I would urge you to consider something closer to Option A or B, since today approximately 25-30% of FCLP takes place at OLF. Having an increase of over 5x in FCLP would be a dramatic increase. I would encourage you to consider keeping the percentages roughly the same as they are today. The EIS indicated that conducting 80% of FCLP at Ault Field would result in some manageable congestion there. I would suggest something more like the 70% at Ault Field like it is today would keep congestion at Ault Field down, while also meaning an approximately 50% increase in FCLP noise events for everyone, rather than an increase of several times current levels for those of us around OLF. We recognize the value that the Growlers provide to our nation's defense capabilities, and the unique role Whidbey NAS plays in their readiness. We welcome the Navy's presence on Whidbey Island, and appreciate the efforts you make to mitigate the effects of jet noise.



# Public Meeting Comment Form

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

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

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

1. Name

2. Organization/Affiliation Citizen

3. Address  Port Townsend WA 98368

4. E-mail

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

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

*I can't understand why the process of designing the growler aircraft does not include any effort to reduce noise. I know there are many other important elements of the design process but you must also include noise reduction.*

*I am impacted by the noise from operations at Whidbey Coveville. Noise impacts are not constant and are not always too noisy, however, there are unexpected and incredibly noisy time periods. Please evaluate*

**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.l. Points of Interest
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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 noise of current operations on Port Townsend/Ft  
Warden/Jackson County.

Please evaluate the impacts of noise in operations  
both currently, and with all alternatives, for  
wildlife, humans, birds, and sea life.

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

**Please print**

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

**YOUR INPUT MATTERS**

Coupeville, WA 98239

I believe EIS is biased and incomplete because impact on schools, outdoor activities and environment are not thoroughly addressed if addressed at all. Our own outdoor activities must stop completely when Navy jets are flying which impacts our livelihood as we are general contractors in the area of the flight patterns. Earplugs are not adequate to shutout the deafening noise and the cardiac/core poundings induced. If the flight frequency increases, the impact will become unbearable with my livelihood and enjoyment of this beautiful island disastrously shattered. EIS needs to be redone to consider all of the ways increased operations will affect the Navy's neighbors on this small island.

- 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
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area



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- 1. Name [REDACTED]
- 2. Organization/Affiliation Lifetime Resident/ANACORTES
- 3. Address [REDACTED] ANACORTES, WA
- 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

Oh if you don't like it, go with Rosie DiDonnel,  
\* Wopsy Souldberg  
② Provide ear plugs for those that request  
them. Ear plugs are mandatory at the refiners  
because of the noise.  
③ If your pictures fall off the wall do a better  
job of hanging them. OVER

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.m. Education Impacts

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- ④ I can't imagine how much <sup>of</sup> this little issue is costing the US Gov. It's time to do a better job of prioritizing Military <sup>priority</sup> is a lot higher than noise that really doesn't affect your health. Maybe put in a race car track to divert attention to the airplanes.
- ⑤ Put issue on a ballot. I would bet that "Pro Growler" is a lot more popular than the "Anti Growlers". Sometimes ballots tell us what the "silent majority" thinks. Not just the vocal whiners.
- ⑥ Ask the whiners if they attend a sea hawk game. Often, the NAVY makes a flyover <sup>flyover</sup> to after the national anthem. That ~~can't~~ be as ~~any louder~~ loud <sup>than</sup> the NAZ warbird planes.
- ⑦ What would local schools do w/o the Navy People leaving here?

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

Please print

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

YOUR INPUT MATTERS

1.a. Thank You  
12.c. Socioeconomic Impacts

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

DATE TAKEN: Thursday, December 8, 2016

PLACE: Seafarers' Memorial Park Building  
601 Seafarers' Way  
Anacortes, 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

12 \* \* \*

13 (The personal identifiable information disclosure  
14 statement was read to the following commenter.)

15 MR. [REDACTED]: The lady read the public meeting  
16 comment form about the names, street addresses, e-mails and  
17 screen names, telephone numbers, blah, blah, blah, will be  
18 kept confidential.

19 My name is [REDACTED], [REDACTED],  
20 [REDACTED]. I'm a lifetime -- my wife and I are lifetime  
21 residents of Anacortes. Do you want my address? [REDACTED]  
22 [REDACTED], Anacortes, Washington, which is underneath one  
23 of the flight paths that the airplanes take when they take  
24 off. That's Lake Erie. E-mail is [REDACTED], [REDACTED], at  
25 [REDACTED].



1           Okay. Comments. Should I make a comment about  
2 I'm sincere with all this?

3           Okay. No. 1, if you don't like the noise, go  
4 with Rosie O'Donnell and Whoopi Goldberg. How about  
5 provide -- No. 2, provide ear plugs for those that request  
6 them. Ear plugs are mandatory at the refinery -- at the  
7 refineries. So if it's loud, wear ear plugs. If you -- if  
8 your pictures fall off the wall, do a better job of hanging  
9 them. Some woman was just so upset with me that her  
10 pictures fell off the wall.

11           No. 4, I can't imagine how much this little issue  
12 is costing the U.S. government/taxpayers. It's time to do a  
13 better job of prioritizing. Military is a lot higher  
14 priority than noise that really doesn't affect your health.

15           No. 5, put the issue on a ballot. I would bet  
16 that pro-Growler is a lot more popular than the  
17 anti-Growlers. Sometimes ballots tell us what the silent  
18 majority thinks, not just the vocal whiners.

19           Ask the whiners if they attend a Seahawks game.  
20 Often the Navy makes a flyover after the national anthem.  
21 That can't be as loud -- wait a minute. Often the Navy  
22 makes a flyover -- you've already got that -- makes a  
23 flyover after the national anthem. That has to be louder  
24 than the Navy -- NAS Whidbey planes. I suppose that they  
25 probably get down on their knee instead of -- don't put that

1 down.

2 What would the local schools do without the Navy

3 people living here? It would be a disaster.

4 \* \* \*



# Public Meeting Comment Form

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

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

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

- 1. Name [REDACTED]
- 2. Organization/Affiliation U.S.A.
- 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 lived here my whole life & support U.S. Navy - PROCELERS + Growlers. I appreciate what you do in protecting us. I will tolerate the noise - regardless. Live at Lake Erie and enjoy seeing them fly over  
GO NAUX!

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



# 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  Port Townsend

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 been well informed about your position and belief that the community of Oak Harbor, Coupeville, Port Townsend... will not be negatively affected...

Experience is the BEST indicator and teacher of the many problems with the present Growler situation - not even adding on the increases proposed. Enough negative impact on our Puget Sound - no additional noise with additional

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**

Oh sure!

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted

Oak Harbor, WA 98277

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

I support Alternative 2 Scenario B for several reasons. I believe it most fairly distributes the impact between north and central Whidbey. It provides the largest positive economic impact to the area by locating an increased number of personnel, and requires additional construction to accommodate the squadrons. I am a little disappointed that Alternative 2 does not reduce the number of FLCP's required, since it does provide a larger number of expeditionary squadrons which would not require that training, and wish that could be addressed as a win-win solution.

Oak Harbor, WA 98277

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

I am concerned that the Draft EIS does not consider water contamination from any other sources other than the proposed development impact, in which it states there is no threat of contamination to groundwater. There is currently a concern over the past and current use of AFFF for fire fighting which when applied leaves potential PFAS contamination in our local groundwater supply. If the chemical is still being used for emergency situations, then any increase in flights creates an increase in the potential contamination of groundwater. This aspect has been omitted from the Draft EIS, and needs to be addressed.

Lopez Island, WA 98261

Below are specific comments to the EIS. I would like to add that our home is located on the south end of Lopez Island. The constant base level drone noise of the growlers is excessively taxing and invasive on our audible senses. After a while, it creates an adverse physical and mental impact. We are concerned about our physical well-being, as well as the negative impact the growlers have on our property value. It is mind-boggling that our US Navy believes the growlers have little to no impact on our environment. Specific EIS comments follow: 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

- 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

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.



**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)  
 \_\_\_\_\_, LANGLEY CHAMBER OF COMMERCE
3. Address \_\_\_\_\_ LANGLEY, WA 98260
4. Email \_\_\_\_\_

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

### Comments

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

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

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

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 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:**

*Whidbey Island residents are being asked to sacrifice their hearing, health, water, livelihoods and wellbeing for the sake of the Navy. It is too much.*

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

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

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

Port Angeles, WA 98362

The North Olympic Peninsula takes its responsibilities for protecting its exceptional environment seriously. People come here from throughout the world to enjoy and learn from it, adding to the economic well-being of people who live here and do what we can to complement the protection Olympic National Park, Forest and other such lands provide. We expect our military to find ways to train without ruining a World Heritage Site and other irreplaceable qualities.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area

LANGLEY, WA 98260

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. 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. 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
- 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.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.q. Potential Hearing Loss

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
- 3.a. Aircraft Operations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects

## 1 PUBLIC MEETING

2 (3:00 p.m.)

3 (The personal identifiable information disclosure  
4 statement was read to the following commenter.)

5 MS. [REDACTED]: My name is [REDACTED], and I  
6 have heard the confidentiality statement and accept it.

7 I live at [REDACTED] Road on Lopez Island in  
8 the state of Washington, 98261. I have lived full time on  
9 Lopez Island for 13 years. I have a master's in clinical  
10 social work from Columbia University. I also have a  
11 master's in landscape architecture from Cornell University.  
12 I am a licensed practitioner of clinical social work in the  
13 state of Washington, have been in the state of New Jersey,  
14 and have a clinical school of social work license.

15 My deep concern is for the impact of the noise  
16 over this very fragile island community. I have lived here  
17 and witnessed people suffering tremendously in our community  
18 center, in homes, when these Growlers have flown over. I  
19 have witnessed it when I've been out on the boat, on boats,  
20 on the ferry. I've been on my little boat, a 20-foot wooden  
21 boat, when these Growlers have flown over, and it's  
22 literally shaken the boat.

23 When the Growlers first started flying the  
24 children in our school dived under their desks with fright.  
25 They have become accustomed to it now. This is not fair.

1 There have been -- in the last two years since the last time  
2 I attended this meeting the escalation of noise has -- has  
3 been very visible and very audible. I have used the Quiet  
4 Skies site to identify the times when it's flown over my  
5 house and I've been disturbed.

6 I ask that you please, please, please reevaluate  
7 adding 37 more Growlers to the flights. In addition, I  
8 plead that you change the flight pattern over these islands.  
9 The last time I was here I had an extensive conversation  
10 with a man who told me that this area was the only place in  
11 the United States proper that these Growlers could practice.  
12 If, indeed, that is so, which I can accept, I'm not  
13 knowledgeable about that, I would really profoundly implore  
14 you to change the flight patterns over these fragile  
15 islands. Thank you.

16 \* \* \*

1.a. Thank You

Coupeville, WA 98239

The use of OLF needs to stop. The Navy does not own this Island the people own this land, homes, businesses and the Navy is endangering and destroying their way of life.



Seattle, WA 98106

- 1.a. Thank You
- 2.j. Costs of the Proposed Action

The costs are not justified. The carbon impact of burning this much fuel is not justified.  
The noise and other negative impacts on wildlife and humans is not justified.

February 7, 2017

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

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

- 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 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.

Thank you for considering these comments.  
Sincerely,

  
Port Angeles, CA 98362

1.a. Thank You

Oak Harbor, WA 98277

I support the Navy's mission on Whidbey Island including increased Growler operations at OLF Coupeville and Ault Field

Greenbank, WA 98253

It is essential to be aware of the WHOLE picture in regards to the Growlers impact.  
Integrity is important to ALL involved. Health is a right of ALL.

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones

PORT ANGELES, WA 98362

The Growler gets are so loud that I cannot sit outside at night and relax. I do not approve of these atll, especially when the Navy has other resources to do these practices already. There is a National Heritage Site on the Olympic Peninsula too.

1.a. Thank You

12.n. Quality of Life

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

7.d. Recreation and Wilderness Analysis and Study Area

1.a. Thank You

Freeland, WA 98249

The rest of the country should have the privilege of hearing the Growlers! Perhaps they should be stationed in Florida, near the Hotel Al Margo, so President Trump will feel more secure!

Freelaand, WA 98249

The NAS has been on Whidbey. The Growlers are recent and their noise exceeds commercial and other military aircraft. The Salish Sea is in danger as are the fish, birds and whales. If you protect us from external threats and destroy the living, breathing life that goes back to pre-dinosaur times, what is the point? Spread the noise to less sensitive environments!

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

Port Angeles, WA 98362

Not for the first time the Navy has failed to comply with the National Environmental Policy Act. Because of the following deficiencies, omissions, and failures to properly implement NEPA, I ask the Navy to issue a revised, second draft EIS with a new public comment period. NEPA 1500.1(b) "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." According to the Draft EIS the Proposed Action would increase electronic attack capabilities by adding 35 or 36 Growlers. It does not address 40 additional Growlers that are in the process of delivery beyond the 35 or 36 identified in the Proposed Action. 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..." (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). 1502.14 (a) "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated. (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits." The DEIS lacks significant explanation of how any off-Whidbey sites were studied and compared. Nor does it provide thorough reasoning for dismissing off-Whidbey Island sites to conduct flight carrier landing practice (FCLP). The DEIS fails to establish why the Whidbey site which is a WW II relic, far short of standard acreage and runway length and can only operate under a DOD waiver. Why is this site superior for training its pilots than a site that is not surrounded by residences, national parks, schools, businesses, and government offices? NEPA 1502.7 Page limits The text of final environmental impact statements (e.g., paragraphs (d) through (g) of §1502.10) shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages. The length of this DEIS greatly exceeds the 300 page limit. NEPA 1508.7 "Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the DEIS analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways . By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) the DEIS fails to consider resulting flights over other areas. The DEIS lacks information on flight paths to and from other training areas such as the Electronic Warfare Range (EWR) and the NW Testing and Training (NWTT) areas. Addressing impacts from just one portion of the aircrafts' flight paths does not make sense. Increased Growler flights will certainly Impact people and wildlife beyond the DEIS study area and these are not addressed in this document or the EWR and NWTT documents. The Navy has, to date,

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 19.b. Revised Cumulative Impacts Analysis
- 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
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.l. Points of Interest

piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juan Islands, 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. 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.



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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 [Redacted]  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military) veteran  
3. Address [Redacted] Coupeville, WA 98239  
4. Email [Redacted] author

- 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.
- 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:

My understanding is that the aircraft carrier, the Kitty Hawk was decommissioned in May, 2009 and is at the Puget Sound Naval Station, Bremerton, Washington.

Why not take that aircraft carrier, station it at sea, and let all flights use it for their touch and go and never have to fly over any homes, eliminating almost all of the boxes checked above

Thank You

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

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

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



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Online at: <http://www.whidbeyeis.com/Comment.aspx>  
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1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Private citizen; resident of Coupeville; Navy supporter;*

3. Address \_\_\_\_\_, *Coupeville, WA 98239-0493*

4. Email *☐* \_\_\_\_\_

but to be read on...

*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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(over)

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- 2.k. Range of Alternatives
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- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
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- 7.j. Impacts on Outdoor Sports



Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.

Noise impacts on commercial properties including agriculture.

Additional Concerns:

Risk of increased aquifer and well contamination. *Water's already disgusting, but poisonous??!*  
 The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.

The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.

The impact on marine and terrestrial wildlife such as orcas and migratory birds.

The major terrorist risk for Whidbey Island by siting all Growlers here.

Mishaps and crash risks due to problems such as the Growler onboard oxygen system.

Please include any additional comments and concerns here:

I lived 1 1/2 miles from OLF for 15 years +, and recently moved farther South on Whidbey. The noise increase, plus effects on wildlife in the area, became apparent over those years, as the planes fly directly over that property. *More so, in recent years (as in, too close!!) the house shook.* Fortunately, I'm not the owner. However, I've seen potential homeowners/renters leave the premises the minute they hear + see the planes overhead (in what's meant to be quiet).

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.

I'm also aware of the negative affect of the entire base being closed. *That would ruin our economy. Balance,* For more information, go to Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis) Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler EIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

Provide citizens (Ear protection, anyone?) moral, environmental setting). please.



## Public Meeting Comment Form

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

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

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

1. Name
2. Organization/Affiliation local Pt Seine 1980
3. Address  Port Townsend wa 98368
4. E-mail
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

We want less growlers not more - they make dangerous noise over public land - The National Parks - these are for local citizens and tourist trade - We do not want our tax dollars spent on Growlers that cause heart murmurs, hearing loss brain damage - + Seizures, Ear plugs don't stop the hearing damage - (+ you can't get the wild life to wear earplugs - not reasonable) We should not be harming the wild life in the Olympics with producing 113 db at altitude of 1,000 ft. and people.

this will be worse with 3 together -

Please print • Additional room is provided on back

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

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 12.h. Tourism
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



*(Handwritten mark)*



# Public Meeting Comment Form

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

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

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1. Name

2. Organization/Affiliation Quaker

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 object to the Navy acquiring more "Growlers  
 & or basing them on Whidbey Island - ~~I don't think~~  
 I object to any Growlers here - they are  
 dangerous to local people and animals - the  
 high decibels of noise affect the heart, the hearing + etc  
 they should not be flying over populated areas  
 or National parks populated by Wild life  
~~It should~~ The environmental impact statement is  
 inaccurate - There are drastic effects on tiny beings  
 from 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.r. Nonauditory Health Effects



Port Townsend, WA 98368

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

Port Townsend, WA 98368

Piecemealing projects to avoid analyzing cumulative effects is illegal. Because the Navy has, to date, piecemealed its aircraft training and testing activities affecting 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); the current 2016-2017 DEIS (36 Growlers); and, likely, a seventh process, as confirmed by a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160—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. Since 2010, the number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,500 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to virtually all Navy public processes to date, there are “no significant impacts.” The Navy’s planning and funding cycles begin years in advance of implementation, so no member of the public with any common sense believes that the Navy did not know well in advance that many Growlers would be coming to NASWI. The resulting separation of impacts foreclosed the public’s ability to know their full scope. Further, 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.” This DEIS is therefore another example of segmentation of impacts for the purpose of avoiding cumulative effects analyses. In addition to segmenting noise impacts to allow for only those around the runways, it segments the very air, by failing to analyze exhaust emissions from flight operations that occur beyond this narrowly defined “study area” around the runways. It 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. 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 3 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 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,

- 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
- 4.d. Day-Night Average Sound Level Metric
- 4.I. Points of Interest

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. Concerns about segmentation of impacts were repeatedly raised during the Navy's scoping process for this DEIS in 2014, yet the Navy has ignored them. This violates NEPA §1508.23, which says a "proposal" exists at a stage where effects can be meaningfully evaluated. In this DEIS they cannot be meaningfully evaluated, and therefore, the document is incomplete and must be re-done.

Port Townsend, WA 98368

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 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."6 Further, the three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. The Navy has exacerbated this 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 comment on the preferred alternative.

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated

Port Townsend, WA 98368

The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.i. Proposed Action
- 4.f. Noise Measurements/Modeling/On-Site Validation

Port Townsend, WA 98368

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 these areas 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. While DNL is the FAA standard and is used at commercial airports, 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 Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. The FAA policy allows for supplemental or alternative measurements.<sup>7</sup> So the continued use of DNL may be to the Navy's benefit, but does not benefit the public. The Navy's analysis does not allow for peak noise experiences, nor does the DNL method take into account low-frequency noise, which is produced at tremendous levels by Growlers. Finally, and most troubling, 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.<sup>8</sup> Some of these affected communities and wildlands may not hear takeoffs and landings, but they are severely affected by military flight operations. In one example, the Navy's 244 percent increase in aerial combat maneuvers (dogfighting) from 160 to 550 "events" per year as mentioned in the previous

1.a. Thank You

1.c. Segmentation and Connected Actions

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

19.g. Cumulative Impacts of Noise

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

EIS for Northwest Training and Testing, is not addressed, nor does the Navy define the time, duration, and number of jets in a single "event." Therefore, impacts from this increase 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.

Port Townsend, WA 98368

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<sup>9</sup>) along with the planned arrival of approximately 42 more Growlers in addition to the 36 evaluated in this DEIS, bringing the total to 160, not the 118 Growlers the public has been led to believe would be the final number. 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 public is going to become upset when they learn that this additional 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."<sup>10</sup> 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, will not view this new information favorably. Further, 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. Moreover, 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. This is such an inappropriate use of residential areas and should be re-located to a unpopulated military site. 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." These mitigation measures will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. The current DNL noise modeling method and data in no way reflect exposure accuracy, given this new information. Therefore, such analyses

- 1.a. Thank You
- 12.k. Compensation to Citizens for Private Property
- 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
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.e. Day-Night Average Sound Level Contours and Noise
- 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



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. With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for these student pilots causing physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable.

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

Port Townsend, WA 98368

In still another example of the flaws in this DEIS, the contamination of drinking water in residential and commercial areas near the NASWI runways, due to use of hazardous chemicals, is completely ignored. 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 9 previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,500, 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. 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 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<sup>11</sup> makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals. 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 Northwest Training and Testing 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.

Port Townsend, WA 98368

Impacts to wildlife are not being addressed in the DEIS. Because the scope 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 study area. For example, the previously mentioned 244 percent increase in aerial combat maneuvers (dogfighting), which by their erratic nature cannot safely occur in the study zone, has been neither examined nor analyzed in any current or 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. It does not make sense to segment impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But except for boilerplate language about species life histories and citations of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.<sup>12</sup> The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (Engels, S. et al (2014) Nature 509, 353 - 356 (doi 10.1038/nature13290)). A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. It's an established fact that the federally listed marbled murrelet has been declining at an unsustainable rate of 4.4% per year, or 44% since 2001. So significant is this decline that the State of Washington "up-listed" them from threatened to endangered in December 2016, citing loss of habitat as the primary reason. There is no disputing the fact that noise alters habitat. Neither the Navy nor the Fish and Wildlife Service fully considered the significant physiological effect that elevated stress levels have to immune response; rather, the agencies claimed there is insufficient evidence to show that noise-induced stress threatens survival and reproductive success. In the most recent Biological Opinion (July 2016) the study they cited (Busch and Hayward, 2009) actually contradicted them, stating that suppression of the immune system, severe protein loss, deposition of fat and atherosclerotic plaques, hypertension and other effects were possible, especially when noise is sporadic and the species could not acclimate to it. It is irresponsible and scientifically invalid to conclude without corroborating scientific evidence, as this DEIS has failed to do, that all birds, including marbled murrelets, and in fact all wildlife in the 12 A Synthesis of two decades of research documenting the effects of noise on wildlife" (Shannon et al. 26 June 2015), Biological Reviews.

- 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.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract> 11 study area, are “presumably habituated to the very high level of noise and visual disturbances at NAS Whidbey Island.” Marbled murrelets and many of the species mentioned in the DEIS also occur outside the study area. It is irresponsible to fail to acknowledge and analyze the impacts to them by assuming that just because they don’t live under a runway, they are not being adversely impacted.

MA LMHC

Licensed Mental Health Counselor

Telephone

Port Townsend, WA 98368

EA-18G Growler EIS Project Manager  
 Naval Facilities Engineering Command Atlantic Attn: Code EV21/55  
 6506 Hampton Boulevard  
 Norfolk, VA 23508

To whom it may concern:

January 3<sup>rd</sup>, 2017

I have lived in Port Townsend, WA since 1987. About 5 years ago Navy Jet noise became much louder and flights increased. Sometimes the sound is constant all day and night long, even in the summer when windows are open to sleep. The planes circle close to our home. The Growlers from Whidbey Island Naval base are the loudest experience I have encountered. Prowlers were easy comparatively. Whidbey Island day trips? Sometimes we turn around and go home because the sound is insufferable. I have cried at Fort Casey and Deception Pass camping because of the Navy Growlers. Growlers fly year round, day and night leaving no breaks for sleeping. In the past days and weeks would go by without flights and you could relax. This is no longer true, and will become less with the addition of 36 new planes.

The current amount of Growlers is already too many. Adding 36 new jets increases flight times over the Olympic Peninsula. The Peninsula is a densely populated area. The sound has been documented to be well over the limits for safe hearing. This is damaging to public safety and seriously impacts our tourist destination reputation, on which our livelihood depends. The EMF warfare training project means additional jets increase flights significantly over Olympic National Park, which is a world Heritage site and a major tourist destination (as is Port Townsend). Even commercial jets are routed around the park to respect this. Olympic National Park is home to "one square inch of silence" and should be respected as such. Adding these low flying jets into an area that is densely populated and tourism dependent is detrimental.

Last summer while hiking the Elwah and Sol Duc Rivers, we heard and recorded Growlers flying overhead day and night throughout the 5 days we were there. Hiking in remote wilderness, it is a shock to hear jets loudly flying over and over, repeated flights along the same flight path. This seriously hampers the "wilderness" experience and endangers animals like nesting Marbled Murrelets and Spotted Owls, which are vulnerable populations and close to extinction.

Another issue is the contaminated wells on Whidbey islands. The chances of additional accidents in which the Navy uses toxic fire fighting materials that contaminate private wells and groundwater is increased with the addition of 36 planes. It is already a big issue for citizens of this area.

This is a non-essential area. These training flights should move to Idaho or areas that are less densely populated and do not involve such high levels of tourism. Please in the interest of public safety and livelihood stop the addition of 36 new planes. We are already at the limit of what this area can tolerate. And maybe you could find a way to lessen the noise the current jets make? For safety and well being. Thank you.

Sincerely,

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.n. Alternatives Considered But Eliminated
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area

Lopez Island, WA 98261

I am opposed to the increase in growler operations. The noise level at my home is horrendous and detrimental to the peaceful environment as well as impacts on the wildlife. I support the concerns of quiet skies group and am including their comments below. Thank you very much. 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

- 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

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.

Port Angeles, WA 98362

The Draft EIS Fails to Consider All Impacts The draft EIS only analyzes potential impacts for 35 or 36 of potentially 160 Growlers, and is further confined to evaluating impacts only to areas immediately surrounding the runways. However, jet noise, emissions and other impacts from Growler operations adversely affect a wide area including Olympic National Park, state parks, tribal and private lands as well as Puget Sound and endangered Orcas and other species. By failing to enlarge the scope of its analysis beyond Naval Air Station Whidbey Island, the DEIS also violates NEPA by not considering all the interdependent parts of a larger action: Growler operations cannot proceed without takeoffs and landings, regional overflights, broadly distributed noise impacts, etc. By failing to consider these additional impacts, the DEIS also fails to evaluate cumulative effects as required by NEPA. The Draft EIS Fails to Consider All Alternatives The Navy has not made a good faith effort to explore other alternatives as NEPA requires in S40 CFR 1502.14 (a). All of the Navy's 'alternative' scenarios will increase noise, harm to health, and other adverse impacts. The Navy's "no action alternative" would continue Growler operations that currently expose people in homes, schools, parks and businesses to noise that exceeds community standards set by the State of Washington, the EPA, the Occupational and Health Administration (OSHA), and the World Health Organization. No genuine "no-action" alternative is proposed that would address these impacts. Furthermore, the draft EIS violates basic NEPA procedures, as it appears to improperly reflect procurement and operational decisions already made by the Navy. Increased Air Emissions and Worsening Effects on Climate Change Not Adequately Addressed Growler jets use an extraordinary amount of fuel--a single Growler jet's emissions dwarf what thousands of citizens seek to reduce voluntarily by choosing to use electric cars, add solar collectors to their homes, and conserve energy in other ways. In its continuing and planned expansion of the Growler fleet, the Navy has ignored the cumulative impact of Growler emissions, including their effects on climate change. The military is the world's largest single user of fossil fuels, and exhaust emissions beyond the narrowly defined affected areas near runways are not being analyzed and should be. The Navy Has Failed to Document that DOD-Owned Lands Are Unsuitable or Unavailable for Growler Operations The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to examine non-Whidbey Island sites to conduct flight carrier land practice (FCLP). Instead, it continues to assume that an outdated and dangerously small World War II landing strip on Whidbey, the OLFC, can be used for an increasing number of Growler and other training flights. The two most dangerous aspects of flying are the approach, landing and takeoff. Because the OLFC is about 49,000 acres smaller and 3,000 feet short of the Growler standard for these maneuvers, it places nearby schools, hospitals, residences, a state ferry terminal and parks, and a state conference center at serious risk of accidents. This risk is greatly increased because FLCP maneuvers are, by their nature, conducted at low elevations where collision with birds is likely to occur, particularly since much of the surrounding area is a protected habitat for shore birds. The draft EIS, itself, acknowledges that one of the runways at OLFC has an "unacceptably steep angle of bank" and can only be used 30 percent of the time due to weather conditions. Yet knowing this, the Navy is significantly increasing the number of flights there and placing nearby communities at harm. Impact on Threaten Endangered Species

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 12.c. Socioeconomic Impacts
- 18.a. Climate Change and Greenhouse Gases
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources



Not Adequately Addressed The Navy needs to provide a more detailed and specific response on whether and how the additional Growlers will affect endangered species, particularly Marbled Murrelets, given that the acknowledged lack of scientific information on noise impacts to this species affects the ability to determine harm and cumulative effects. This is particularly urgent in light of their precipitous decline and the December 2016 decision by the State of Washington to reclassify Marbled Murrelets from threatened to endangered. More generally, by failing to initiate consultation under Section 7 of the Endangered Species Act with the US Fish and Wildlife Service on the potential impacts from the significant increase in Growler flights, the DEIS fails to evaluate direct, indirect and cumulative impacts on threatened and endangered species. Inadequate Consideration of Public Health Impacts Growler jets utilize the latest electronic warfare capabilities yet the risk of exposure to people and wildlife from downward-directed radiation is not considered. The only discussion we are aware of was a brief mention in a 2014 EA, in reference to radio transmitters on mobile emitter trucks and the stationary transmitter at Pacific Beach on the Olympic Peninsula. In that document, the Navy referenced a paper and concluded that links from radiation exposure to leukemia were speculative, when in fact, that same paper stated unequivocally that there are direct links between radiation exposure and childhood leukemia. Despite this, any mention or discussion of risks from exposure to electromagnetic radiation from Navy jets is completely missing from all discussions of potential impacts. The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading for two reasons: (1) the Navy inappropriately uses a 365-day averaging rather than busy-day averaging, and (2) the Navy represents as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. Furthermore, modeled noise levels by the Navy have not been validated with on-site noise data nor has the Navy made any actual noise measurements in the affected communities. In addition, the NOISEMAP software used for computer modeling is outdated, and a report from a DOD commission concluded that noise measurements using this software may be legally indefensible. Additionally, the DEIS selectively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. Moreover, there are no alternatives proposed in this DEIS that would reduce noise. Therefore, it represents decisions already made. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." Also, as mentioned earlier in this letter, by narrowly considering only takeoff and landing noise and exhaust emissions at the runways themselves, the DEIS violates the National Environmental Policy Act (NEPA) §1508.25 by failing to consider the wider area of functionally connected impacts caused by naval flight operations. The DEIS Fails to Consider Historic and Economic Impacts The Navy has not responded to an August 2016 request for formal consultation under Section 106 of the National Historic Preservation Act, from the City of Port Townsend, in a letter also asking the Navy to expand its Area of Potential Effect (APE). The APE is so narrowly defined in this DEIS that the State Historic Preservation Officer (SHPO) wrote to the Navy in January 2017, confirming that not only would cultural and historic resources within the existing APE be adversely affected, but also recommended expanding the APE to include additional portions of Whidbey Island, Camano Island, Port Townsend, and the San Juan Islands, because the state is "...not convinced that the 65 dBA serves as the best or most appropriate measure for quantifying and assessing harmful levels of sound and vibrations

from Growler activities.” The SHPO went on to say, “Our concern is based upon what appears to be an averaging of sound levels over long time periods that does not adequately capture the real time experience of brief but more numerous exposures to higher decibel levels, as well as the cumulative effect of these events.” Additionally, the addition of Growlers will have a deleterious effect on the economy of the region. The region is heavily dependent on recreation and tourism and Washington's overall economy is heavily dependent on tourism and outdoor recreation, accounting for: \$22.5 billion annually, 227,000 direct jobs, and \$1.6 billion in tax revenues. Accordingly, any expansion of the Growler fleet needs to address potential job loss, economic harm, and state revenue loss from decreased tourism and outdoor recreation. Conclusion For all of the deficiencies, omissions, and failures to properly implement NEPA, as cited above, we are asking the Navy to issue a revised, second draft EIS with a new public comment period. We appreciate the opportunity to comment on this draft EIS. Thank you, [REDACTED]

King, WA 98103

I strongly oppose the expansion of the EA-18G Growler Airfield Operations at NAS Whidbey Island due to the inadequate scientific analysis of the impact to both animal and human life as well as socioeconomic and environmental factors.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted

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.

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 block]  
Name: [Redacted]  
Address: [Redacted]

*Sequim WA 98382*

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

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

Port Townsend, WA 98368

1.a. Thank You  
12.n. Quality of Life  
4.t. Noise Mitigation

I have lived in Port Townsend for 29 years. When I first moved here, one of the things people always commented on when visiting was how quiet our area was. Now, no one can be here for very long without hearing the noise of Navy jets. During the summer, jets operating above Port Townsend are often heard at 11 pm. This affects the quality of life here in a very negative way. Limiting flight operations to the hours between 8 am and 6 pm is an alternative that should be considered.



# Public Meeting Comment Form

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

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

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

1. Name [REDACTED]

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

3. Address [REDACTED] Port Townsend WA 98368

4. E-mail [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

Re: Electronic Warfare Training  
with advances in computer technologies and programming, why is it not possible to provide "virtual" simulations for training up to a specified level of flight crew competency, with some final "live" testing? I asked this question at the meeting, but none of the personnel felt comfortable responding.

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.k. Range of Alternatives
- 3.j. Flight Simulators



Jan. 25, 2017

EA-18E EIS Project Manager  
 Naval Facilities Engineering  
 Command (NAVFAC) Atlantic

Att'n: Code EV21/SS  
 6506 Hampton Blvd.  
 Norfolk, Va 23508

Abused Citizen of the Puget Sound Area

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects

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 misconception 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.

Sincerely

[Redacted signature area]

LaConner, WA 98257-8927

[Redacted contact information]

your reply is appreciated

Jan. 25, 2017

EA-18E EIS

Project Manager

Naval Facilities Engineering  
Command (NAVFAC) Atlantic

Attn: Code EV21/SS

6506 Hampton Blvd.  
Norfolk, VA 23508

*Sleepless on Fidalgo Island  
Swinomish Indian Reservation*

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 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.

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.



La Conner, WA 98257-8927



*would appreciate  
a reply*

Jan. 25, 2017  
 EA-18E EIS Project Manager  
 Naval Facilities Engineering Command (NAVFAC) Atlantic  
 Attn: Code EV21SS  
 6506 Hampton Blvd.  
 Norfolk, VA 23508

*Abused Citizen of Fidalgo Isld. Strait County*

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).

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.

The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21<sup>st</sup> 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
- 4.q. Potential Hearing Loss
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones



*your reply  
will be appreciated*

*La Conner, WA 98257-8927*





Jan. 31, 2017

EA-186 EIS Project Manager  
Naval Facilities Engineering Command  
(NAVFAC) Atlantic

Attn: Lode EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

MASUR0004

- 1.a. Thank You
- 1.d. General Project Concerns
- 11.d. Per- and Polyfluoroalkyl Substances
- 13.a. Environmental Justice Impacts
- 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
- 4.a. General Noise Modeling
- 4.q. Potential Hearing Loss

Environmental Justice analysis overlooked the fact that <sup>fishermen</sup> 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.

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

The DEIS 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.

Don't we  
have the right  
to breath clean  
air, drink  
unpolluted  
water, have  
a chance to  
sleep through  
the night?  
etc.

What about  
having to deal  
with 130 decibels  
on our front  
porch. Will you  
restore my lost  
hearing?



La Conner, WA 98257



reply will be appreciated

Sequim, WA 98382

Dear EA-18G EIS Project Manager: RE: Draft EIS for EA-Growler airfield operations at Naval Air Station (NAS) Whidby Island. By improperly segmenting the Navy's expansion of Growler activities, ei: piecemealing many different proposals for adding Growler's to it's Whidby Island base, it has duped and confused the public about the scale of it's planned electromagnetic warfare training activities, so that in effect it will have 160 Growler's operating out of it's Whidby Base and flying over Puget Sound and the Olympic Peninsula, home to four cities, numerous small towns, industries and Native Tribes reliant on the resources of this area and fearful about the impact EMWT will have,. The public has also been deceived in the Navy's public meetings, calling their new plan to add 35 or 36 Growler's to it's already extensive fleet and operations, "adjustments", rather than the huge increase it is. Expenditures of public monies for the most expensive, polluting and nosiest jets in US history, which make life hell, compromising health and sanity for those near it's base and endangering the multimillion tourist industry on the Olympic Peninsula, which is treasured for it's World Heritage Site-Olympic National Park and Forests, known for their pristine beauty, peace and quiet. This area is home to endangered species which require quiet for survival, as do local PTSD recovering war veterans, five Native Tribes and others who make their living from these forests and coasts. Backcountry hikers, and foragers also utilize the very MOA area that the Navy plans for their EMWT exercises. Proven scientific health and noise impacts have been ignored and under rated in the Navy's EIS and public presentations. The Navy has lied that EMWT requires downward directed magnetic radiation impulses as well as those directed upwards and ignores the disruption this also causes to one of the largest migratory bird corridors in the world, as well as myriad other life forms that would be affected. The Draft EIS has failed to consider all the alternatives to doing EMWT over and on the Olympic Peninsula as NEPA requires. A Navy official has said that simulated training is an effective alternative training method, that would be much less damaging to the natural environment. The Navy has also failed to document that its many DOD owned lands and bases are unsuitable or unavailable for Growler Operations that would not involve the impact that it has on the Olympic Peninsula and Puget Sound as well as the Olympic ocean coast, also required by NEPA. Very importantly, the Navy has not adequately addressed the increased air emissions by these extremely polluting EA-Growlers and their worsening effect on Climate Change. All of these concerns need to be addressed. I recognize the need for military training purposes to keep our country safe, but this can be done without disrupting the dense population base and extreme environmental fragility and beauty of this pristine area, recognized worldwide. As a hiker who frequents Olympic National Park and surrounding forests, I can attest to the very disturbing frequent sound of EA Growler jets already frequenting our skies, counting as many as 10 on a single day hike, disrupting the very peace and serenity I seek. I have friends who are awakened in the night and whose homes shake with the overflights of already active EA Growlers. It's insane to feel as if we live in a war zone here. Poor public relations, for sure! Sincerely,

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 1.d. General Project Concerns
- 18.a. Climate Change and Greenhouse Gases
- 18.d. Washington State Greenhouse Gas Goals
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.d. Program of Record for Buying Growler Aircraft
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 7.d. Recreation and Wilderness Analysis and Study Area
- 9.a. Consideration of Tribes

1.a. Thank You

Sequim, WA 98382

I am totally against adding 36 more growlers to the Navy's already more than substantial fleet. War and preparing for war is not helping to bring about peace in the world. Instead, wars create more wars in an unending cycle of environmental destruction to our planet and those living upon it, and lining the pockets of the military industrial political complex. This is not the legacy I want to leave our children, grandchildren and generations to follow.

Bainbridge Island, WA 98110

I am STRONGLY opposed to the military training proposed for the Olympic Peninsula, in Washington state. Not only will this cause gray harm to the 1 billion birds (already threatened by climate change) that fly up and down the pacific coast using it to navigate, and harm to other animals as well as people, but this will greatly pollute the airways, as each jet burns 1304 gallons of fuel 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 ) This is proposal is an outrage to not only to the wildlife but to all citizens who will be affected. This must not be approved. Thank you. Sincerely [REDACTED]

1.a. Thank You

10.a. Biological Resources Study Area

10.I. Bird Migration

18.b. Average Carbon Dioxide per Aircraft



Port Townsend, WA 98368

Dear Sir/ Madam, I strongly object to the continued noise from Navy Growlers. This noise level has been scientifically shown to cause permanent hearing loss. Most importantly, 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." Thank you for listening. [REDACTED], concerned citizen

1.a. Thank You

1.c. Segmentation and Connected Actions

2.c. Compliance with the National Environmental Policy Act

2.d. Program of Record for Buying Growler Aircraft

4.q. Potential Hearing Loss

Brinnon, WA 98320

I am a retired 26-year resident of Brinnon, Wa which is adjacent to the National Forest Service and Olympic National Park. I moved here because of the tranquility, a profound love of the natural flora and fauna, wildlife and the pure ecology of this region. It is very distressing to learn that the Navy is proposing to conduct Growler aircraft operations over the waters adjacent to and land of the Olympic Peninsula. The noise will have a detrimental effect on humans, wildlife and sea life. I strongly object to the operations in this location. Perhaps the Navy has outgrown its base on Whidbey Island and should move to another location. And why would you have airplanes that are so loud in the first place? Respectfully, [REDACTED]

- 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
- 7.d. Recreation and Wilderness Analysis and Study Area

Brinnon, WA 98320

Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable."

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what

- 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] Briton, WA 98320

Coupeville, WA 98239

To whom it may concern, I am writing this letter to express my concern because we - residents of Central Whidbey - are about to face several serious physical and environmental challenges in near future. I am specifically talking about Navy's Environmental Impact Statement regarding EA-18G Growler Airfield Operations at NAS Whidbey Island Complex (Naval Outlying Field – OLF). When I purchased my house in 2010, I was fully aware of Navy's touch-and-go operations at the OLF. However, I still chose to live here because of its pristine environment, history, and great community. I am currently a weekend commuter – I am a special education teacher in ██████████ County and am planning on retiring here. This is where my family and I always vacationed in the past and hope to enjoy my retirement years from now. I am usually not politically involved or vocal about issues like this. And I fully support military operations on the island, in and outside our great country. However, recent proposal of significant increase in operations and potential hazards concern me greatly. Here are some of my concerns; 1. Water contamination My neighborhood, Crockett Lake Estates, has a community well. Results of recent water testing indicate that there is an evidence of fire retardant used for jet crashes. It is estimated to be caused by "practice" runs during current operations. Then, what will happen if and when a Growler crashes in this area? What are the short and long-term effects on our environment and economy? This is the water we drink, cook, shower, and water our plants. What will be the impacts on our farming community? Currently there is no alternative water source for Town of Coupeville or surrounding areas. What would be an alternative plans? 2. Noise It is estimated that we will experience significant increase in the amount of noise from the Growler operations (increase from 6100 operations per year to 35000 operations per year). The impact of this (not just in decibels but also in the number of flights) is unimaginable. I understand that DEIS attempted to address this, however, the noise modeling used in DEIS is not appropriate representation of noise made by Growlers (this modeling was developed to assess civilian airport noise). 3. Ebey's Landing National Historical Reserve Here is an excerpt from Ebey's Landing National Historical Reserve Visitor Guide: "In the early 1970s, local citizens organized to halt a housing development slated for Ebey's Prairie. The effort became a balancing act – to find a way to preserve a cherished and historically significant place, without sacrificing the needs and future of working rural community. Believing that local government and citizens were needed to find that balance, Congress established Ebey's Landing National Historical reserve in 1978. The legislation establishing the Reserve contains two points that are essential to understanding the Reserve. First, the Reserve was established to preserve and protect a living rural community – much more complex than preserving a historic site. Second, it is continuity that makes the Reserve's history so significant. The story of the Reserve is not a thing of the past – it is kept alive by people who continue to live, work and maintain deep connections with the natural and historic landscape. The Reserve concept is what makes the balancing act possible. Reserves differ from parks in their approach to preservation and management. For Ebey's Reserve, this means that the land within the Reserve is not owned or regulated by any one agency. While there are federal, state, town and county lands within the Reserve, a surprising 85% is privately owned. Preservation occurs through land donations, tax incentives, local land use regulation, conservation

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.j. Property Values
- 4.a. General Noise Modeling
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

easements, and the cooperation of property owners. Success means that the landscape, the community and its history will continue forever, to be shared, protected and enjoyed by future generations.” 4. Impacts on children As a teacher, I cannot imagine exposing our school age children to constant loud noise and expect them to do well. What are the impacts on their sleep, school performance (including state-wide and/or district-wide assessments), and long-term effects on hearing? 5. Economical impacts on the area Due to the increase in Navy’s Growler operation, it is estimated there will be significant loss in tourism, property value, population and business. Whidbey Island tourism is highly tied to outdoor recreation. How can we expect people to enjoy our beautiful island when there is constant noise? Farmers to continue growing their beautiful, organic produce? Have your dream wedding on the island? I hope we can find a balance between our military operation and quality of life for the citizens of Central Whidbey. I keep re-reading the excerpt from the visitor guide - What an incredible concept our Congress had! Please help us protect our beautiful island, community and its history so that our future generations can enjoy. Thank you for your consideration on this. Sincerely, [REDACTED]  
[REDACTED] Coupeville, WA 98239

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

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

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

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

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

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

- 1.a. Thank You
- 11.a. Groundwater
- 11.b. Floodplains and Wetlands
- 11.c. Marine Waters and Sediment
- 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.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

**Comments**

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

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

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

Please include any additional comments here:

Increase in flights/practices/noise  
Water quality

## What else you can do

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

## To Learn More

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

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

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Port Townsend, WA 98368

Dear NAS Whidbey Island Complex Administration: We are 'done' with the Growler Operations invading our pristine rain forests and surrounding countryside and towns. They affect the wildlife and all the people who live here. Please move the EA-18G Growler operation to an environment which does not have the bountiful wildlife, pristine rainforest and rivers, and large populations of people....perhaps move it to Eastern Washington in the deserted grasslands(middle of the state). You are not welcome or appreciated at the NAS Whidbey Island Complex. Sincerely, [REDACTED]

victoria, British Columbia v8r 3s9

the noise from the jets is quite troublesome. It has frightened our grandchildren and our dog, and has on a number of occasions panicked people we have been with who thought we were having an earth quake. In addition to the noise that disrupts our enjoyment of time spent at home as well as out doors, we are quite concerned about the damage to the environment caused by the fuel exhaust from these planes. Victoria has had excellent air quality and is why many of us have chosen to live there. we are gradually losing the clean air that we breathe.

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)

Victoria, British Columbia V8R 3T8

I live in the Greater Victoria area, just slightly west of Oak Bay. The noise from the U.S. navy Growler jets is getting more pervasive, more disruptive and more annoying! As a close neighbour to Oak Harbour, I am surprised that you haven't thought about informing us of your intentions to increase the number of aircraft and thus multiply the noise level for us here on lower Vancouver Island. The "touch and go" exercise of this jet creates loud rumblings and roars for us and basically disrupts our quiet existence over here! I hear it inside our house and especially when I am on the deck and gardening. Maybe you would consider moving this portion of your operation to the dessert in Arizona where nobody lives apart from the rattle snakes? Truly, it would be appreciated if you would include us in your info seminars so we can tell you our experiences with this noise level. I am amazed at what the residents of Whidbey Island have to endure when we visited friends at their beach house this past summer. Jets flew over the ocean of their bay constantly. It was very disruptive and loud. Why have you chosen Whidbey Island as the base for this type of training when it is so densely populated in that area and ours? Surely this type of "practicing" to "reinforce the muscle memory" of the pilots should take place in a non-pop-ulated area where the least amount of humans are affected. Yours sincerely, [REDACTED], Victoria, B.C.

1.a. Thank You  
12.n. Quality of Life  
2.e. Public Involvement Process  
2.k. Range of Alternatives  
2.n. Alternatives Considered But Eliminated



Anacortes, WA 98221

There is one maneuver in particular that the Growler jets do that is extremely loud. The jet is pointed nose up, gear down, and engines very loud. I have been told that it is a "slow down" for approach to landing. When this is done over our home, it is not possible to hear other people speaking INSIDE our house. Conversation outside is impossible. Sometimes, this is also done during night training, as late as midnight. If this particular exercise could be moved far from populated areas, that would be a significant improvement in the situation.

1.a. Thank You

3.f. Field Carrier Landing Practice Operation Totals

Anacortes, WA 98221

The Growler jets are incredibly loud during certain maneuvers, often occurring directly over the densely populated Skyline neighborhood in Anacortes, WA. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was 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

Anacortes, WA 98221

I understand that the Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards may have been 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). There are times when the jets passing overhead, directly above our house in the Skyline neighborhood, are loud enough that normal conversation is not possible. Typically, this seems to happen during a maneuver in which the jets are slowing, gear down, nose up. I've been told that this is a "slow down" exercise in preparation for landing. This really shouldn't be done directly over homes, no matter the intended flight pattern.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.a. General Noise Modeling
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss

Anacortes, WA 98221

The noise level from the jet inside our house, during certain maneuvers, is loud enough that we cannot carry on a conversation. In particular, when the jets are in a configuration with the nose up, gear down, resembling a stall. I've been told that this is a slow-down for approach to landing. The engines are incredibly loud over our house during this maneuver. 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

4.n. Speech Interference (Indoor and Outdoor)

4.q. Potential Hearing Loss

Port Townsend, WA 98368

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

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

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

January, 2017 Comments

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

1. First Name [redacted]
2. Last Name [redacted]
3. Organization/Affiliation
4. City, State, ZIP FRIDAY HARBOR, WA 98250
5. E-mail [redacted]

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

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

- 1.a. Thank You
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.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.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

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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

*SEE ITEMS 12 and 13 on attached sheet*

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12. The Growler itself is much noisier than the jet that it replaced several years ago at Whidbey. Yet, this EIS study assumes that the current noise level is environmentally acceptable, and therefore the only thing that needs to be addressed is the addition of the new Growler aircraft to the fleet. Unfortunately, this is not the case — the current noise environment created by the existing Growlers is already at an unacceptable level. Therefore any study that assumes this baseline measure is “okay” with the affected community, is flawed from the start.


13. A very unique feature of the Whidbey Island and San Juan Island environments, is the very low ambient noise level. It is, of course, one of the reasons many people decide to live in these communities. Yet no mention is made in the EIS of this uniquely low ambient noise level in the surrounding community. Rather, it is stated just matter of factly, that 65 DNL is the baseline for studying how many individuals are affected by the Growler noise. This is poor science.

While 65 DNL may be an appropriate measure of incremental noise pollution in an urban environment, it is not a good measure to use in the rural areas surrounding the Navy airfields. While I don't have the necessary equipment to measure the ambient noise on San Juan Island where our house is located, I would guess that it is on the order of 45 or 50 DNL at most, if not lower. Therefore, any incremental noise above this level is in essence noise pollution. A more thoughtfully prepared noise study would first measure these baseline levels around the community, and then conduct an incremental analysis of the both the existing Growler fleet and the proposed additional Growler fleet. I think any such analysis would clearly indicate that a vastly larger population is impacted by the Growler.

- 1.a. Thank You
- 2.e. Public Involvement Process

Victoria, British Columbia V8Y1R5

I cannot believe you are reviewing this subject and not holding a public Open House in Victoria< BC . For years we have had to listen to your jet roars. We have advised you of our concerns and yet you appear to care less. I suspect the impact of your jets are more significant in Victoria than in many of the other US Washington State gulf islands> Kindly re consider and send your Open House team to Victoria to explain yourselves. thank you



Seattle, WA 98146

To expose the Olympic Peninsula aggressive noise pollution to satisfy some perceived need to perfect skills "needed" to protect our nation is putting the cart before the horse. What should we protect if not our pristine natural treasures. It's nuts!!!

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.a. Purpose and Need
- 7.d. Recreation and Wilderness Analysis and Study Area

1.a. Thank You  
12.n. Quality of Life

Victoria, British Columbia V8N 1J1

We are really hoping you will take into consideration the considerable noise pollution in our city because of the existing jets. Victoria is a lovely quiet little city and we are already frustrated with the huge amount of noise your airfield creates.

Anacortes, WA 98221

The defense of our country is obviously of paramount importance and the Growlers are a main part of this effort. I understand that, but if I didn't mind jet noise, I would have moved to Whidbey Island. The Growlers are flying directly over my home in Anacortes VERY OFTEN at times and always at loud enough decibels that I can't hear my TV, my wife talking or myself think. This is unacceptable. It has also kept us up at night. You may be thinking NIMBY but if it were you, you wouldn't have expected this noise if you were in my neighborhood either. It is far enough from NAS Whidbey that one wouldn't expect it. Please register my opinion and please keep the jet noise on Whidbey Island only which is the only place it should be. And thank you for your service.

1.a. Thank You

4.n. Speech Interference (Indoor and Outdoor)

4.p. Sleep Disturbance

Coupeville, WA 98239

We have lived at [REDACTED] Coupeville, Wa. since 1977. We understood and agreed to the Navys "Noise Zones" that were established when we purchased the property. Most of the OLF flights stayed in the correct flight patterns and every now and then a trainee pilot would fly wide out of the pattern and fly over our house, usually late at night. We understood and accepted this, but after 3 times we would call NAS Ops. Ops was always polite and said they would contact OLF to correct the pattern, after they contacted OLF they stopped flying over the house. The navy and community was at peace. The point is we (community) can work together with the Navy and accomplish the training for our pilots if the number of flights at OLF does not exceed 20% of all FCLPs (Scenario "C"), and the noise zones are not expanded from the current flight patterns. I think it would be a major mistake to increase the number of flights beyond what we have currently. Increasing the number of aircraft and number of landings at OLF is not workable beyond current OLF landings..Let's work together, we have in the past.. A point of interest: Has anyone given any thought that NAS Whidbey is about 2-3ft above sea level and would directly be impacted if an earthquake Tsunami roared down the Strait and took out the base with 100% of the Navys EA-18G's. Not a good idea to have most of our very important aircraft located at one base?

1.a. Thank You

1.d. General Project Concerns

16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)

2.m. Record of Decision/Preferred Alternative

Coupeville, WA 98239

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.

Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

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



Coupeville, WA 98239

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

7. Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Coupeville, WA 98239

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 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

Coupeville, WA 98239

1.a. Thank You

13.a. Environmental Justice Impacts

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

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

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

Coupeville, WA 98239

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.

Coupeville, WA 98239

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

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

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 than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

Coupeville, WA 98239

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

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



Coupeville, WA 98239

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

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

Coupeville, WA 98239

We are homeowners in Admirals Cove and have been since 2004. Our original property disclose cited 76 decibels, not the 135 that are now being observed. There are far better places to perform flight testing than this beautiful island. Eastern Washington, for one. The Navy should not be averaging noise levels for our community.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 7.c. Noise Disclosure

### 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 Lopez Resident, proxy for mother Earth

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

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

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

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

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

- 1.a. Thank You
- 2.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.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](http://www.QuietSkies.info)

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

I do not believe a full, truthful, study in high accuracy of information is being done. I would like a true evaluation. So you have many citizens commenting

(Continue on the back)

on the disruptiveness of growlers, yet more  
are coming. Basically, the people who make these  
~~these~~ determinations do not care about the  
population who is affected. This needs to change.

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 Quiet Skies.

3. Address [Redacted] Lopez

4. E-mail N/A

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.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
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Comments

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

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- 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:

Why hasn't the greater Victoria B.C. area been included in the EIS process? AT Thanksgiving I read front page coverage in the Times Colonist (Continue on the back) of how Whidbey's noise was impacting their quality of life.

## 1.a. Thank You

oak harbor, WA 98277

The Coupeville navy practice field has been there since the 1940s!! All the complaining residents signed a noise impact statement when they bought their property. I live in Oak Harbor, and we had to sign one when we bought our home. It strikes me as odd that someone ( navy ) can have a property, people buy their property cheap, due to a known noise zone, then complain about the noise!!!! These C.O.R.E people knew what they were getting into, and it would be unfair to take away a training field for our air crews!!!! Again these complainers knew what they were getting into, is IS NOT RIGHT that they are trying to close a practice field, that helps the men and women that protect our country! !!!!!

## 1.a. Thank You

oak harbor, WA 98277

First of all the navy field near coupeville was there long before these complainers built their homes!!!! So they knew, and bought their land, knowing full well there was a practice field there, now they are trying to shut it down to increase their property values!!!! Next I live in Oak Harbor, and I live under the flight path, and knew that when I bought my home, and honestly the jets dont bother me!!!! If they are up there I feel safe down here!!!! Air crews need to practice and stay sharp, for whatever they are called to do!!! Im sure the complainers have never spent one second in the military, but if we were attacked they would be the first to say go get them!!!!

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 Copitz, WA 98261

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

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

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

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



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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

- 12. Add your own comments here:

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Seattle, WA 98117-325

1.a. Thank You

7.d. Recreation and Wilderness Analysis and Study Area

I am a Washington resident and frequent hiker and camper. The Olympic National Park is one of our most precious natural resources. It is the site of what is known as "the quietest place on earth." This will destroy that! We have so few of these rare places left and we must preserve them or they will be gone forever.

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

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

- 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.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 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.e. Day-Night Average Sound Level Contours and Noise
- 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

**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,



PORT TOWNSEND, WA 98368

Oak Harbor, WA 98277

- 1.a. Thank You
- 12.j. Property Values
- 2.m. Record of Decision/Preferred Alternative

Thank you for the opportunity to comment on the Growler operations EIS, dated November 2016. The EIS document states that the NAS Whidbey complex is the only location and the U.S. Navy is the only military service to provide the electronic attack capability. So this Navy capability is unique in the United States. Since the NAS Whidbey complex is the only place in the United States to provide this essential service to the military members it protects or U.S. citizens in general please do not let the small number of local complainers have any bearing on the decision to select the vital and necessary operational parameters. I also suggest since this is a unique capability at NAS Whidbey complex the Navy leaders make the correct operational decision not based on complaints or loud voices but based on what works best for the Navy and the U.S. I do suggest you select Scenario B, keeping the split 50% at both NAS Whidbey and OLF Coupeville. I have lived here 45 years and the Navy has always said they try and keep the split 50% at both OLF and NAS. It only seems right to keep that same split in the future. I have sold real estate on Whidbey Island for 42 years. The price of homes around OLF, such as the Plat of Admiral's Cove has for those 42 years always been about 20% less than a similar home in size and view located in Oak Harbor. The difference in price has always been the noise. Therefore splitting the flights different from 50% in both OLF and NAS would certainly be a huge change that I do not think would be right or fair to the people living in the two communities. I also believe that a change in percent split of flights between OLF and NAS that has been in place for over 40 years would subject the Navy to an expensive lawsuit that I do not want the Navy to go through. In summary the tactical airborne electronic warfare practiced at NAS Whidbey complex is unique with no other military options therefore the Navy leaders need to make the decision based on operational needs but the scenario chosen should be Scenario B keeping the past 40 years of past practice the same. [REDACTED]

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](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

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

1. Name [REDACTED] CAPT USN RET.

2. Organization/Affiliation SELF

3. Address [REDACTED] PT WA 98368

4. E-mail NONE

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 LOOK FORWARD TO NAVY PLANS FOR SIGNIFICANT  
UPGRADES TO FAC/FLT OPS/UPGRADES TO PERSONNEL  
IMPACTS. PROVIDING SIGNIFICANT ENHANCEMENTS  
WHILE ACCOMODATING UPGRADES TO FLT OPS,  
CAREFUL ACCEPTING BENEFITS TO CIVILIAN  
WAYS OF LIFE IS ESSENTIAL.

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**

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

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

- 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
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- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 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.e. Day-Night Average Sound Level Contours and Noise
- 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

**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

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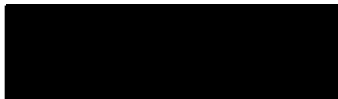
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Thank you for considering these comments.  
Sincerely,



*Port Townsend WA 98368*

Langley, WA 98260

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- 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
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(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at:

<https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on

page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and

contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and

wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test.



Langley, WA 98260

1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 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 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

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- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
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- 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
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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.

Langley, WA 98260

1.a. Thank You

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

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).





# Public Meeting Comment Form

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

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

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

1. Name

2. Organization/Affiliation citizen

3. Address  Port Townsend 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

I oppose the EIS and its findings for the following reasons:

1. Notice in 2014 <sup>the</sup> prior was insufficient. It has not been corrected.
2. Comment periods have therefore been affected; citizen input has been impacted negatively from the beginning.
3. The EIS fails to meet the functionality of

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

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.e. Public Involvement Process
- 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.

connected activities. It does not address cumulative impacts,

4. I object to the process used because the Navy has divided a large project into small pieces making citizens input confusing and difficult,

5. I object to the findings of the EIS because it fails to take into account the impact on the Olympic National Park, a designated World Heritage Site.

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

Please print

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

**YOUR INPUT MATTERS**

Langley, WA 98260

- 1.a. Thank You
- 1.d. General Project Concerns

I would like to receive more information about this proposed action. I am very concerned about the possible impacts from, and long term effects of, increased noise and the possibility of chemical contamination, among other issues.

Clinton, WA 98236

Dear Sir/Madam, Thank for taking the time to read the comments being sent to you. I am quite concerned on a number of issues regarding the proposed large increase in growler flights at NAS Whidbey Island. Please see below.

----- 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. We live on S Whidbey and the jets fly here as well, and the noise is quite loud. We cannot imagine having to deal with such a large increase in flights as seems to be the proposal. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable." (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to

- 1.a. Thank You
- 1.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.b. Invisible Costs
- 12.c. Socioeconomic Impacts
- 12.j. Property Values
- 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.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
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to 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. This is totally unacceptable as well as illegal. 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." I would want to know the impact of this on humans, as well as birds, and marine mammals and other animals. 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." 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. Our communities are not being given the full consideration they should be.

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. All we know is there will be a large increase in flights, noise, and detriment to ur communities, but how much, we really don't know.

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. This is a very unique environment with all the water and mountains. Sound travels very far.

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. This is an unrealistic way to evaluate the effects of noise. If you cannot teach students because of the noise level that is unacceptable. 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. Again, like a shell game. 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. This is an outrageous reason to limit weekend flying. There are much fewer hunters than other people who use the national forest and other affected areas.

Our economy depends in large part on tourism and outdoor recreation by ALL. 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. Hundreds of times a day? Would you want your child to have to endure that? How stressful. 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. Ground water eventually goes into the Sound. What effects would there be to the Puget Sound? 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>) Our knowledge of chemical contamination and dangers has increased significantly in 20 years. This is ludicrous indeed. 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. If there has already been an impact to groundwater, it only seems logical that a large increase in the use of the facility and obvious chemical contamination will also increase. 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. Again, this area is a widely diverse habitat with so many land and water species to consider. We are responsible to try to maintain the health of these habitats, and the Navy is responsible to the public. 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. There seems to be many instances where the Navy has not done its homework. This DEIS does not answer a very many concerns I have. Another concern is the effect on the economy of the area by expanding the Navy operations. A recent study shows that the Navy actually takes away money from our tax base, both in sales and property taxes, and the schools are not funded fully for the Navy children attendance. As well as the decline in property values due to jet noise. See <http://sustainable-economy-collaborative.com> The Puget Sound area already has a large Navy presence and by increasing the growler fleet here, it is shifting an unfair burden to its citizens for economic, environmental, and health reasons. Thank you for considering these comments. Sincerely, [REDACTED]

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Oak Harbor, WA 98277

Thank you for the opportunity to comment on November 2016 EIS for the EA18-G, Growler, airfield operations at NAS Whidbey Island complex. I have lived on Whidbey Island since 1972, arriving here as an A-6 pilot and eventually leaving active duty and subsequently joining the Navy Reserves. I certainly have been interested and followed the activities of the Navy and its operations at NAS Whidbey for the 44 years I have lived here. During that time I have been a businessman in Oak Harbor for 38 of those years as well as a County Commissioner for 16 years. Therefore I speak from a perspective of having military aviation, business, and public office background. The EIS evaluates three action alternatives with each action alternative having 3 scenarios using different percentages of FCLP's flown at NAS Whidbey and OLF Coupeville. Stated in the EIS is the fact that the Navy operating at NAS Whidbey is the only location and the only military service of the United States to train for and maintain a tactical airborne electronic attack capability. Therefore since unlike most other military capabilities there is no other U.S. military backup for this essential warfare specialty. The electronic warfare training and operations at the NAS Whidbey complex is unique and should be treated accordingly. The reason I discuss the uniqueness of operations of the Growler at Whidbey is the 3 action alternatives need to be decided between not because of the environmental concerns but since there is no other capability of this warfare specialty in the U.S. the choice of which action alternative needs to be decided because of the needs of the United States in particular the needs of the Navy to provide this unique capability. There is nothing about any three of the alternatives that is so damaging or removes from existence any environmental factor that would preclude the alternative from being selected. Therefore I recommend the Navy decision makers make the choice of alternatives based on providing the best ability to carry out this unique capability of Electronic Attack training and warfare and within the realm of financial ability. However I do have a very strong recommendation based on my 44 years of observations of and experience at both NAS Whidbey and the local community in the selection of the specific scenario of split of FCLP between NAS Whidbey and OLF Coupeville to use in whichever action alternative is selected. To the best of my knowledge from my first days 44 years ago as a new A-6 pilot doing FCLP's at OLF and NAS to the most recent carrier training operations at the NAS Whidbey Complex the split between NAS Whidbey and OLF Coupeville has always been as close as possible to 50:50. Therefore I recommend and encourage you to keep the 50:50 split or Scenario B. While there has always been more noise complaints from a very vocal but small group around OLF, to fly a much higher percentage at NAS Whidbey would certainly not be fair to the much greater population around NAS Whidbey. Also it would not be from a training stand point the right thing as the darkness offered at OLF Coupeville provides a much more realistic training environment. Likewise even though the training is much better at OLF it would not be fair to burden the residence around OLF Coupeville to a much higher percentage than they have had for the past most likely close to 50 years. I think it is instructive to remember that using Scenario B in any of the alternatives produces no greater number of FCLP's at OLF Coupeville than were experienced on average in the 70's 80's and early 90's. Lastly if I was to be so bold as to suggest an alternative that in all reality should be a decision left up to the Navy decision makers based on providing the safest and best ability to

provide electronic attack capability my suggestion is Action Alternative 2. From my very limited perspective that most likely achieves best the objective of proving for the U.S. with the best electronic attack capability. As mentioned my perspective or knowledge of the correct alternative is very limited to nonexistent and is a decision that should be based on the needs of the Navy. However I am very sure the correct scenario is Scenario B. Respectfully, [REDACTED]

Coupeville, WA 98239

Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable."

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what

- 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,

Coupeville, WA 98239

The DEIS does not map out the actual APZs for Coupeville to be drawn in the EIS. The Navy needs to elaborate on its plans to resolve incompatible land uses, and for a public comment period after the final EIS is issued.

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 5.a. Accident Potential Zones
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones



# 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 PRIVATE CITIZEN - TAXPAYER
- 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

I SUPPORT THE NAVAL BASE & THE MILITARY USE OF THEIR GROWLER FLIGHTS. I DO NOT THINK THEIR PRACTICE SCHEDULES COULD BE CONDUCTED TO BE LESS IMPACTFUL OVER OUR SMALL RURAL COMMUNITIES & PERHAPS POSSIBLY MORE OVER THE OPEN WATERS OF THE STRAIGHTS OF JUAN DE FUCA OR OVER WASHINGTON STATE AS A WHOLE. I AM HOWEVER TOTALLY OPPOSED TO PUBLICALLY PRINTING THEIR FLIGHT SCHEDULES IN THE LOCAL NEWSPAPERS. I NOT A GOOD SECURITY MOVE. I GOOD LUCK WITH ALL THE BLEEDING HEART ACTIVISTS THAT WANT TO CLOSE THE GATES BEHIND THEM! WE HAVE TO TRY TO LIVE IN HARBOR AS WELL...

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

1.a. Thank You

Bow, WA 98232

I am opposed to any additional growler activity or expanded flight zones in the San Juans! I live on Samish Island and the noise from them is already more than I care to hear....thank you

Port Townsend, WA 98368

Please, please, please DO NOT use the pristine Olympic Peninsula for Navy war trainings. I am very concerned about the habitat disturbance.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

1.a. Thank You  
12.k. Compensation to Citizens for Private Property  
4.t. Noise Mitigation

[REDACTED]  
Friday Harbor, WA 98250  
January 20, 2017

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

Dear Sir or Ms.:

I oppose the Navy's proposal to add up to 36 Growler Jets to the Naval Air Station on Whidbey Island, Washington. I will continue to oppose the plan, even if the Navy addresses all of the concerns on the Draft Environmental Impact Statement raised by my friends and neighbors in the San Juan Islands. I oppose it because the all measures proposed to mitigate the effects of jet noise are unenforceable, since there is no effective mechanism for redress of any violations, which – given my own experience in working on similar issues with an MOA in central Nevada – there certainly will be.

In short, I have been down this road before. The Navy proposed several expansions of its MOAs in central Nevada during the late 1970s and 1980s, it held hearings on its Draft EISs, collected citizen input, drafted modifications, and finally secured approval. In every instance, the Navy then relegated the EIS to the status of a bureaucratic hurdle to be overcome, and the citizens who offered input as inconvenient annoyances to be placated and mollified. In other words, the Navy did exactly what it wanted to do.

The problem was – and remains – there is no effective recourse to the citizens who are impacted by this increased noise of these additional aircraft. The Navy may offer toll-free numbers and provide online complaint forms, but in my experience, this has been worse than no mechanism at all, because they give a sense of redress that is, in reality, unavailable. In every instance in which I am personally familiar in central Nevada, the Navy found that there was insufficient data to support a citizen's claim of damages. It didn't matter if the complainant had cracked walls or shattered windows or panicked livestock; the Navy consistently found that there was no direct, provable link between military jet noise and the claimed damage. Each incident was treated as a case of "You said, we say"; and in each incident, the citizen lost.

It is not enough that the Navy propose to address the issues raised by citizens in the Draft EIS stage of this current proposal or that it offer mitigation to get past the EIS stage. When the results of this expansion in the form of ethereal, untraceable, unquantifiable, unreproducible – but nevertheless harmful – "loud noises" become manifest, we need concrete ways to bring the Navy to genuine accountability. Until the Navy creates and demonstrates that it can implement such accountability – unless and until there are demonstrable, effective avenues of recourse for citizens who are impacted by the addition of these aircraft – I will oppose this proposal.

Thank you for your consideration of my views.

Sincerely,  
[REDACTED]



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

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

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

Clinton, WA 98236

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

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

Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

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

Clinton, WA 98236

1.a. Thank You

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.

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  
7.c. Noise Disclosure

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

Clinton, WA 98236

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

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.d. Day-Night Average Sound Level Metric

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

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

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

EA-18G EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
Attn: Code EV21SS  
6506 Hampton Blvd  
Norfolk, VA 23508

December 7, 2016

Dear Project Manager,

I am writing out of concern and during the comment period regarding the EIS associated with the Navy's plan to bring at least 35 new EA-18G Growler aircraft to NAS Whidbey Island. I will also be attending the public meeting in Coupeville, WA on December 9.

Having moved to Whidbey Island a year ago this month for retirement from my work in the eastern U.S., I'd like to underscore that I, like most who live here, chose this location for its incredible natural beauty (Ebey's Landing Historic National Reserve, Puget Sound/Strait of Juan de Fuca, Olympic and Cascade Mountains) and the particular serenity of the low density, rural, peaceful life offered in the small town of Coupeville where OLF is located.

While I was aware of the OLF and the NAS touch and go flights, and had been given information by my Realtor regarding decibel levels of the existing flights and planes when I purchased my home, the increased noise levels associated with the existing Growlers and anticipated increased numbers of flights associated with Scenarios A, B, and C described in the EIS represent a considerable escalation in frequency and noise levels.

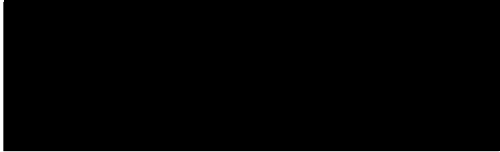
I do not wish to contribute to an escalation of the rhetoric in favor of the increased flights (aka, you are not a patriot if you oppose the Growlers, why don't you just move, etc.), or opposed to them (NAS should relocate all flights off Whidbey Island to another area or they don't care about the citizens who live here and their health). However, I do feel that of the three proposed scenarios, the one which makes most sense, if one is to be implemented, is Scenario C.

The fact is that those people living directly in and around NAS Whidbey and Ault Field are comfortable with, used to, and in many instances directly or indirectly involved with the NAS. Conversely, most of us living near the OLF in Coupeville are living here for different reasons (farming, raising kids, pursuing outdoor lifestyles

hiking, boating, enjoying the peace and quiet of this remote location), locating here to avoid the noise of a bigger population center.

I sincerely hope that you will choose the 80% Ault/20% OLF Scenario C which will be least impactful to our rural and environmentally sensitive area, and thank you in advance for your consideration.

Sincerely yours,



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

Coupeville, WA 98239

EA-18G EIS Project Manager Naval Facilities Engineering Command Atlantic Attn: Code EV21SS 6506 Hampton Blvd Norfolk, VA 23508 December 7, 2016 Dear Project Manager, I am writing out of concern and during the comment period regarding the EIS associated with the Navy's plan to bring at least 35 new EA-18G Growler aircraft to NAS Whidbey Island. I will also be attending the public meeting in Coupeville, WA on December 9. Having moved to Whidbey Island a year ago this month for retirement from my work in the eastern U.S., I'd like to underscore that I, like most who live here, chose this location for its incredible natural beauty (Ebay's Landing Historic National Reserve, Puget Sound/Strait of Juan de Fuca, Olympic and Cascade Mountains) and the particular serenity of the low density, rural, peaceful life offered in the small town of Coupeville where OLF is located. While I was aware of the OLF and the NAS touch and go flights, and had been given information by my Realtor regarding decibel levels of the existing flights and planes when I purchased my home, the increased noise levels associated with the existing Growlers and anticipated increased numbers of flights associated with Scenarios A, B, and C described in the EIS represent a considerable escalation in frequency and noise levels. I do not wish to contribute to an escalation of the rhetoric in favor of the increased flights (aka, you are not a patriot if you oppose the Growlers, why don't you just move, etc.), or opposed to them (NAS should relocate all flights off Whidbey Island to another area or they don't care about the citizens who live here and their health). However, I do feel that of the three proposed scenarios, the one which makes most sense, if one is to be implemented, is Scenario C. The fact is that those people living directly in and around NAS Whidbey and Ault Field are comfortable with, used to, and in many instances directly or indirectly involved with the NAS. Conversely, most of us living near the OLF in Coupeville are living here for different reasons (farming, raising kids, pursuing outdoor lifestyles hiking, boating, enjoying the peace and quiet of this remote location), locating here to avoid the noise of a bigger population center. I sincerely hope that you will choose the 80% Ault/20% OLF Scenario C which will be least impactful to our rural and environmentally sensitive area, and thank you in advance for your consideration. Sincerely yours, [REDACTED]

Coupeville, WA 98239

I disagree strongly with the Navy's plans to increase the number of Growlers at NAS Whidbey. Whidbey Island's features of quiet and natural beauty are its livelihood. The island has developed as a place of pilgrimage to people seeking a particular experience of protected tranquility, whether as tourists or as residents. The use of the airspace over the island for Growler training is not compatible with such an experience. While I understand the need for the Navy to train pilots in aircraft landings, Whidbey Island is no longer the appropriate setting for such training, given the higher noise level and the increasing number of Growlers planned for the future. A different location must be found, where the land use is less impacted by the conditions caused by Growler pilot training.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

7.a. Regional Land Use and Community Character

7.b. Land Use Compatibility and Air Installations Compatible Use Zones



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

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

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

Coupeville, WA 98239

1.a. Thank You  
4.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

Oak Harbor, WA 98277

Personally as a guy who served for 8 1/2 years in the US Navy, I totally understand the trade off we have here on Whidbey to protect our freedom as a country. If a muffler could be put on the jets that fly here, I am pretty sure everyone would be in favor of such a thing, but the reality is that it can not and I support our armed forces 150%!! I do not love the sound of jet noise but understand the statement behind the sticker and its meaning. I am glad the Navy is here and feel more safe as a result not only for me but for my family! Thanks to all the fine service men and women who sacrafic all they do for our great country! Go Navy!!

1.a. Thank You

Enumclaw, WA 98022

#FlyNavy

Coupeville, WA 98239

We purchased our retirement home last year and were aware of the aircraft noise. We lived through last years' flights and didn't find them too objectionable. But you're changing the flight path which will bring the planes directly over our home. And you're upping the number of flights by more than 700% (has this budget been approved?). Both of these will affect our quiet enjoyment of our property. We are a prior military family and have lived close to bases most of our married life. I support the military, but the change of flight path coupled with the increase in flights seems excessive. We won't be able to sell our home, either. If the flight path and the number of flights flown are similar, I have no problems. Moving isn't an option if no one will buy your home. Have you thought about anchoring a "mothballed" aircraft carrier someplace close so the training can be real rather than simulated? Just a thought.

- 1.a. Thank You
- 12.j. Property Values
- 12.n. Quality of Life
- 2.d. Program of Record for Buying Growler Aircraft
- 2.n. Alternatives Considered But Eliminated
- 3.d. Arrivals and Departures
- 7.d. Recreation and Wilderness Analysis and Study Area



Coupeville , WA 98239

We are tree farmers near the OLF Coupeville. The propose increase in flights, even opt 2 would greatly negatively impact our way of life. As it is we can not hear each other talk when the fights occur. I can not image the negative effects constant fights would have. It would destroy the way of life to central whidbey. People visit here for peace and quite. Business are built on that. Also why should all the growlers be in one place making it an easy target to wipe them all out at once. Remember Pearl Harbor?

- 1.a. Thank You
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations
- 4.n. Speech Interference (Indoor and Outdoor)

Coupeville , WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

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- 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  
4.t. Noise Mitigation

Coupeville, WA 98239

As a former military pilot, B52, with thousands of hours of flight time I can appreciate the need for ongoing training of our flight crews. Much of my flight time was also in the traffic pattern over populated areas practicing takeoff and landings. In doing so, we were always keenly aware of the impact that our aircraft noise might have on the civilian population and would modify our activities as necessary to minimize this negative impact. Some of the proposed flight path changes in the pattern at OLF does not appear to afford the same consideration. The tightening of the patterns on runway 14 for both daytime and night operations puts aircraft on the downwind leg directly over the homes lining the waterfront. Why can't the base legs extend a little farther out so as to place the downwind leg over the water, thereby minimizing the residential noise impact? A little extra fuel seems a small price to pay for better relations.



# Public Meeting Comment Form

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1. Name

2. Organization/Affiliation Voting citizen of the USA

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 want to protest in the strongest possible  
terms against increased flights at OLF field.  
I already suffer enough from the existing  
flights. This is a health issue for me.

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



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1. Name

2. Organization/Affiliation

3. Address *Port Townsend*

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

*Why is there no EIS yet?*

*The noise in Coupeville is abominable + yet a federal judge declared it didn't affect peoples health. Of course it does.*

*Do not increase the number of growlers in this area.*

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.r. Nonauditory Health Effects

port townsend, WA 98368

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

please, we need more time to comment. This is the busy Christmas season

Dec 23, 2016

U.S. Fleet Forces Command.

Good morning, I have visited Coupeville, the noise of the growlers taking off stops all communication. Any animals that are outdoors act in a crazy manner - it is not true they become "habituated" to it.

Humans are suffering from deafness, intellectual disorders, and nervous complaints; regardless of what a federal judge rules from Seattle.

Rep Derek Kilmer supports the navy also Rep Rick Larsen - they don't live under the flight path.

We are an isolated population here on the Peninsula; we have no VOICE. All I can ask is that you do not increase the number of growlers here. Spread this abominable noise over the desert too.

Sincerely, 

- 1.a. Thank You
- 10.c. Wildlife Sensory Disturbance and Habituation
- 2.e. Public Involvement Process
- 2.n. Alternatives Considered But Eliminated
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



## Notes on 2015 Activities and Accomplishments

### **Urban Forestry Restoration Project**

Port Townsend was a successful applicant for DNR's Urban Forestry Restoration Project (UFRP) SoundCorps work party effort to improve our urban watershed in 2015 (Attachment 1: PT2015\_work\_efforts.pdf, pp.1-2; Attachment 2: PTLeader press release). In February, a crew of six worked in Haller Fountain/Terrace Steps (Attachment 3: Peninsula Daily News), Sather Woods and Kah Tai Lagoon Nature Park. Target invasive species included Ilex aquifolium, Hedera helix and Daphne laureola. Maintenance and monitoring will be undertaken by park staff and volunteers for the next three years.

### **Arbor Day and Tree Inventory Plans**

Port Townsend Parks, Recreation and Trees Advisory Board (PRTAB) members were joined on April 20, 2015 by Micki McNaughton, DNR Urban Forestry Special Project Coordinator, and two UFRP work crew members for the proclamation of Port Townsend's official Arbor Day at City Council (Attachment 1: PT2015\_work\_efforts.pdf. p. 2; Attachment 4: PT Leader press release).

For Arbor Day 2015, PRTAB members and Adopt-A-Park groups participated in two work efforts. First, Admiralty Audubon led a workparty to pick up trash and pull invasives at Kah Tai Lagoon Nature Park (Attachment 1: PT2015\_work\_efforts.pdf. p. 2). Second, a group of volunteers led by City Council member Robert Gray picked up trash and pulled invasives in Bishop Park and then joined a group of Port Townsend Rotarians to work in our City's newest park, a small play park on Parkside Drive and adjacent to the existing Bishop Park (Attachment 1: PT2015\_work\_efforts.pdf. pp. 3-4; Attachment 4; PT Leader press release).

PRTAB continues to work as time and staffing allow toward a tree inventory grant proposal. In 2015, the Board prepared a draft of the first of a series of color brochures highlighting some of Port Townsend's trees. The first brochure focuses on unique and interesting trees in the City's Historic District. A draft is attached as Attachment 5: PT2015\_Trees\_of\_Port\_Townsend\_1.pdf.

### **Update 2009 Street Tree list**

Functional plans and other working documents require periodic updates. PRTAB and staff updated the Parks, Recreation and Open Space Functional Plan in 2014 and most funding agencies require that it be updated at least every six years. Port Townsend's Street Tree list was last updated in 2009 from an older list whose provenance is uncertain. Given the potential impacts of climate change and associated weather patterns as well as the spread of invasive pest species and the rising emphasis on using native plant species, a periodic update of recommended street trees should consider new information available about selection of appropriate street trees. PRTAB has included this effort in our proposed 2016 work plan for Council approval.

### **TreeLine USA**

Our region's electrical infrastructure was purchased from Puget Sound Energy (PSE) by our local Public Utility District (PUD). Although PSE is a member of TreeLine, our Jefferson County PUD is not yet a member. The Parks, Recreation and Tree Advisory Board continues to encourage the PUD manager and line supervisor to join TreeLine. Our Board's certified arborist member has offered to instruct PUD linemen in appropriate utility trimming practices as per ANSI A300 standards but as yet, no progress can be reported.

*\*2 per capita (person)*

*PUD should join Treeline web site*



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

Recommend the split between FCKPs at  
NAS Whidbey & OLF Coupeville be 80% &  
NAS & 20% at OLF. OLF FCKPs should  
all be night-time ops

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

1.a. Thank You



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

Recommend the US Navy buy more EA18G  
Growlers and increase the number of AC  
in each VAW Squadron

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

**YOUR INPUT MATTERS**

Coupeville, WA 98239

We in Coupeville and central Whidbey Island have been tolerant of the Navy's increasing presence in our lives. However, the threat of an expanded flight training program is pretty much a death knell for us fulltime residents. We have seen infiltration of toxic chemicals in wells adjacent to Navy sites caused by Navy activity. Within the OLF flight area there are homes, hospitals, schools, and a national reserve that endure the noise and pollution of the current schedule. An increase will affect the quality of our lives, our outdoor enjoyment and our property values. We the residents have been accepting of the abuses by the Navy thus far. Prove that the Navy is a good neighbor to Whidbey Island and don't ask those of us who live here to sacrifice our way of life when there are more suitable options for Navy war exercises and training. The EIS is biased and doesn't take into consideration the real toll on our lives.

- 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.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives

Seattle, WA 98199

I implore the Navy not to implement plans to fly Growler jets over the Olympic Peninsula!! This National Park is like a sacred sanctuary to millions of people over the years and is invaluable to many endangered species.

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

1.a. Thank You

Seattle, WA 98119

An increase in jet exhaust noise is unacceptable. Our living environment is irreplaceable and why we live in the NW. I experienced jet noise for two weeks in Olympic National Park last Summer. The noise was startling and took away the entire reason for visiting our natural wild places. Another increase in jet noise must not happen.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 18.d. Washington State Greenhouse Gas Goals
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.c. Compliance with the National Environmental Policy Act
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.b. National Ambient Air Quality Standards Compliance
- 7.d. Recreation and Wilderness Analysis and Study Area

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)  
FOR EA-18G "GROWLER" AIRFIELD OPERATIONS  
AT THE NAVAL AIR STATION (NAS)  
WHIDBEY ISLAND COMPLEX

13

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

22

23

24

25

17           ██████████: I find myself in an unenviable  
18 position of pleading my case to the Secretary of the Navy,  
19 who represents the federal government, which is elected by  
20 the people, the citizens of the United States of America,  
21 to protect and serve those same citizens.

22           The Secretary of the Navy will soon make a  
23 decision regarding the addition of 35 or 36 Growler jet  
24 aircraft to the already approximate 82 aircraft stationed  
25 on Whidbey Island. And some of those aircraft, if not



1 all, will be involved in the proposed electronic warfare  
2 training that will take place on the Olympic Peninsula.

3           Obviously, the noise that we citizens who live  
4 out in this area already endure causes distress. An  
5 increase in the number of jets will subsequently increase  
6 that distress, and you'll potentially further degrade our  
7 quality of life and will possibly cause harm to endangered  
8 species who reside in the national park. The national  
9 park that was set aside by the federal government for the  
10 use and enjoyment by the citizens of the country who  
11 expect to go to that national park and enjoy the natural  
12 environment and serenity.

13           I'm concerned that the risk of endangered  
14 species who reside in this area includes findings of  
15 studies that indicate that the noise from these jet  
16 aircraft, quote, may cause harm. I'm further distressed  
17 that the many species that are not on the endangered list,  
18 no studies have been conducted to see what kind of impact  
19 those species might endure.

20           I was told that studies around Ault Field  
21 indicate that the species that reside in that area appear  
22 to be habituated to the noise. And subsequently, that  
23 evidently makes it okay. What about people? Does that  
24 also mean that if we become habituated to the noise, that  
25 that makes it okay?

1           If I resided in New York City instead of on the  
2 Olympic Peninsula and I rented an apartment next to the  
3 subway, I would have to reasonably expect to be woken up  
4 in the middle of the night and to hear loud subway trains  
5 going by numerous times during the day interrupting  
6 conversations, sleep, meals.

7           But I don't live in New York City. I  
8 intentionally moved to Sequim because of the lower  
9 population, less traffic, quieter environment, and the  
10 proximity to the Olympic National Park.

11           I expect to be able to have dinner on my deck  
12 with my wife or guests and not have our conversation or  
13 peaceful environment interrupted by Growler jets in  
14 transit with dB levels in the 80 to 90 range.

15           In summary, the United States Government is in  
16 place for one reason and one reason only, and that is to  
17 serve and protect the citizens of this country. The  
18 Department of Defense, as part of that federal government,  
19 is now going to make a decision which affects the safety  
20 and quality of life of those same citizens that the  
21 federal government is there to serve and protect.

22           My concern is that the decision is going to be  
23 made to increase the number of Growler jets, thereby  
24 further degrading our air quality, further increasing the  
25 emissions of greenhouse gases, causing further harm to

1 already endangered species, and unknown harm because of no  
2 studies to nonendangered species.

3           Please do not increase the number of jet  
4 aircraft already assigned to Naval Air Station  
5 Whidbey Island. In fact, consider reducing the number,  
6 thereby reducing the noise and serving the citizens of the  
7 United States of America.

1.a. Thank You

Pensacola, FL 32526

Flight training in Cookeville is important

Seattle, WA 98122

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

It is unconscionable to have yet another unnecessary war "practice" that will destroy our ecosystem, our quality of life, our health, and continue the massive consumption of fossil fuels and promote inhumane activity by the USA over the fight for control and money for these very fuels and/or uranium mining resources. We can't be peace promoters by being war mongers, especially over greed for dirty unrenowable resources. The government needs to stop what we are doing. We the People don't want this behavior to continue. We need a caring, livable society, global relations, and a livable planet. As a US citizen, I implore you to not do this activity ANYWHERE!

1.a. Thank You

Deer Harbor, WA 98243

We live at Spring Point on the South West tip of Orcas Island. The Growler noise at our home has increased in frequency and intensity. It is no longer the tranquil place to enjoy life. Help!

1.a. Thank You  
19.d. Electronic Warfare

Fort Collins, CO 80525

Please do not conduct war games on the Olympic Peninsula.

## 1.a. Thank You

Victoria, British Columbia V9C3X8

I just wanted to forward my opinion, as a result of a newspaper article that came out today regarding noise complaints from Vancouver Island residents (Oak Bay this time). By NO MEANS do these people speak for, nor represent the majority here. We're PROUD our military heritage on the island, and understand COMPLETELY that our allies require the same training opportunities to maintain operational readiness. Please know, that your planes cause a very mild, non-offensive noise, that is barely audible unless the winds are "perfect". The people complaining are NIMBY's and constantly whine about any development that they see impacting their millionaire lifestyles. They complain for the sake of complaining, and should keep quiet as the base was there long before their seaside mansions were built. As an aside, I wanted to take this moment (as it is [your] Thanksgiving) to give THANKS for you being such a good friend and ally. The fact your nation takes security and defence spending seriously is an example all Canadians should follow. THANK YOU for protecting our borders, THANK YOU for investing adequately in defence (when we fail to), THANK YOU for being such good neighbours. When the chips are down, we can always count on you... (although we shouldn't have to...but hopefully that changes in the future). Take care, and please know you have support here on Vancouver Island!!! Bring on the Growlers!!!



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

DATE TAKEN: Friday, December 9, 2016

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

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

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

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

(425) 259-3330

1.a. Thank You  
12.h. Tourism  
12.p. Local Differences in Economy

19 (The personal identifiable information disclosure  
20 statement was read to the following commenter.)

21 MS. [REDACTED]: Yes, the statement was read  
22 to me. My name is [REDACTED].

23 The various scenarios are comparing the  
24 operations between Oak Harbor and Coupeville, but nowhere in  
25 the EIS does it really compare the potential impacts between

1 Oak Harbor and Coupeville, and those are two very different  
2 communities with very different kind of economic and  
3 cultural types of focus, Oak Harbor being a military  
4 community that will receive the benefits of all this  
5 increased activity, but Coupeville is more of a tourist and  
6 quality-of-life-based retirement kind of community that --  
7 that will only receive negative impact from -- from an  
8 increase in activity.

9           The -- the Ault Field personnel won't be shopping  
10 in Coupeville. They'll be shopping in Oak Harbor. And I --  
11 I think that the assessment of the split of operations  
12 between Oak Harbor and Coupeville needs to take into account  
13 what kind of damage these -- this increase in activity will  
14 inflict upon a tourist-based economy. The kind of -- the  
15 quality of Coupeville life is just -- it's not an equal kind  
16 of -- kind of situation. And I think the, you know,  
17 people -- I -- I very much like Oak Harbor as well, but it's  
18 a different kind of community and it's more -- it's more  
19 geared for that military focus and more accepting, where --  
20 whereas the damage will be significant to the life in  
21 Coupeville.

22   \* \* \*



# Public Meeting Comment Form

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

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

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

1. Name [REDACTED]
2. Organization/Affiliation \_\_\_\_\_
3. Address [REDACTED] 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

Why doesn't the EIS look at actual noise measurements at key community locations? Why was the DNL considered appropriate when this is not a continuous noise operation?

The EIS fails to look at the impacts of the various scenarios on the community of Coupeville vs. Oak Harbor (OH). OH is a military community which will benefit from increased economic activity at the expanded base, while Coupeville is a historic town with a tourist based economy.

Please print • Additional room is provided on back

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

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

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 12.n. Quality of Life
- 12.p. Local Differences in Economy
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation

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Quality of life is of paramount importance to the central Whidbey tourist economy, and will be greatly damaged by increased Growler activity at OLF. Moreover OLF fails to meet current safety standards, given its location in the middle of the community - schools, public roads & facilities, residences and businesses; plus the nearby location of the Nat'l Historic Preserve and other recreational areas. Noise and ground water pollution have already compromised the community and have not been adequately addressed.

Why can not the Growler training be relocated to a more appropriately remote location? Sites in Alaska or eastern Washington's uninhabited areas would be much more appropriate. The EIS doesn't explain the Navy's determination that this is the only possible location, or explain why all Growlers should be in a single PNW location. This doesn't seem like a wise strategy. Could you please address these issues in the EIS?

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

1002880.0041.10

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 .  
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 / Artist with BUSINESS on PROPERTY*  
3. Address [Redacted] *Coupeville, WA 98239*  
4. Email [Redacted]

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

Comments

*ALL* 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. *We built a new house here + met all noise abatement requirements - lots of \$ + useless. - In addition, our property has been devalued - who would buy it ??*

- 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:**

What can I say - everything listed above applies - just move flight operations to an area that can support the noise, danger, health damage, damage learning of our students - in addition, we are now finding about water quality contamination. You've not listed the elementary, middle + high schools as being severely impacted by the Growler flights. Also, my animals run + hide when the planes are flying - loud + frightening.

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

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

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

Coupeville , WA 98239

1.a. Thank You

2.n. Alternatives Considered But Eliminated

The DEIS should have 1 component only: base all the planes somewhere else, not on Whidbey. Eliminate all operations at OLF. Select a base that does not threaten the economy, health, and safety of Central Whidbey families.



Coupeville, WA 98239-3640

1.a. Thank You

1.d. General Project Concerns

Please stop all flights at OLF. They are dangerous, polluting water and environment, destroying hearing, ruining property values, damaging our Historic Reserve, frightening animals, and should be moved off the island.

1.a. Thank You

Camano Island, WA 98282

I voted for less military spending. The military-industrial-political complex endangers everyone with its endless expansion, spending, and aggression. A trillion dollars a year is far more than any country can afford with every cent of that spending adding to the debt that is unprecedented and unsustainable by every measure. And which spending increases blowback and worldwide pressure. Stop this madness. And whatever gives the military the idea that it can run roughshod over communities with its noise and even expand it? That is also madness.

Seattle , WA 98125

I'm writing to oppose the planned increase in airfield operations at NAS Whidbey Island. The proposed changes would be harmful to residents, visitors, and wildlife. The air pollution caused by a dramatic increase in jet activity will have a negative impact on residents' health, as will the noise pollution. Unannounced closures of parks will undermine local tourism and may cost people their jobs. The noise and chemical pollution will certainly harm both animal and plant life in a large area surrounding the base. This action will be, overall, very damaging and must not proceed.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 17.a. Hazardous Materials and Waste Impacts
- 6.b. National Ambient Air Quality Standards Compliance

1.a. Thank You

Victoria, British Columbia V8n5x4

Nice to have the Navy prepared to defend the West Coast. Thank you

1.a. Thank You

**From:** [REDACTED]  
**Sent:** Friday, November 25, 2016 12:16 PM  
**To:** webmaster  
**Subject:** Environmental Impact Statement for the EA-18G Growler Airfield Operations Website

It is nice to have someone prepared to defend the West Coast. Thank the Navy.

[REDACTED]

Sent from my iPad

1.a. Thank You

Kineth Point , WA 98239

Keep the Growler flying in Coupeville

Clinton, WA 98236

Please respond to the concerns outlined by the Sustainable Economy Collaborative in their recent report "Invisible Costs: The \$122 Million Price Tag for The Naval Air Station Whidbey Island." You may find that report here:

<https://sustainable-economy-collaborative.com/report/> Directly in regard to the operation and proposed expansion of the Growler Airfield Operations at Naval Air Station Whidbey Island, please refer to pages 22-32 in the section III., "External Costs." These costs include and are not limited to: - Health effects - Reduced Property Values - Risk of catastrophic accident - Toxic releases, such as recent well contaminations by PFAS's - Injury to local tourist economy Unless the methodology of this report can be demonstrated illegitimate, then this report ought to be incorporated into the Final EIS. While this report is detailed, it still leaves many concerns out, including the impact of noise on wildlife and the cascading ecological effects. For one example, refer to the documentary "Sonic Sea" ([www.sonicsea.org](http://www.sonicsea.org)) for impacts of noise on the marine environments. The Whidbey Island community will from this point forward pressure the Navy to be accountable for its impacts at every turn and as publicly as possible. The current draft EIS is a clear and blatant forfeit of duty by failing to document actual impacts that the "Invisible Costs" report demonstrates are readily documentable. Please do not continue to abuse your position of power and forfeit your primary duty to this community, the citizens our military is there to serve. Thank you for incorporating these evidence-based concerns into the Final EIS, [REDACTED]

1.a. Thank You

10.c. Wildlife Sensory Disturbance and Habituation

10.m. Impacts to Marine Species and Habitat

12.b. Invisible Costs

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

West Linn, OR 97068

I am writing in protest to the Navy's intentions to use specific areas of the Olympic Peninsula for war games and training. This pristine forest area is one of only 12 places in the whole of the United States identified as sound natural, where one can experience true silence of natural landscape. The importance of preserving this experience for future generations is immeasurable. In an era of violence, encroaching technology and loss of pristine natural habitat I vehemently oppose any plan to compromise these lands.  
sincerely, [REDACTED]

- 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
- 2.I. No Action Alternative

Coupeville, WA 98239

1. I was an A-6 navigator and understand the importance of night FCLP's. I appreciate the lengths the Navy has gone to to reduce the number of FCLP's at OLF Coupeville. Since I have not heard of any accidents at the carriers with a Growler involving a night approach, it would seem that whatever the Navy is doing now is working. (unless there have been accidents I haven't heard about) Crews evidently are safe with the current methods. It would seem the only reason for increasing operations would be an increase in the number of pilots (not planes, but pilots) and that increase should be proportional. 20% increase in pilots = 20% increase in FCLP's. 2. An increase in FCLP's will hurt the environment. I don't think anyone could argue it will improve the environment. Maybe an argument could be made that it won't change the environment, but I don't think a reasonable person would say that going to 35000 FCLP's a year would represent no impact on the environment. The discussion is then on how much, not whether. For this reason, I think that it is worth the money and inconvenience to the Navy to hold the number of FCLP's to current levels plus an allowance for increased pilots.

Beaver wa, WA 98305

Ok you keep "buzzing my house" you have woken up my kids some many time I can even remember at this time, you have not come and talked to the public in Forks wa, we have a small business and you are impacting it by your pilots not following the ceiling, Please stop flying over beaver wa it is a populated area

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.e. Public Involvement Process
- 3.c. Military Training Routes
- 4.l. Points of Interest
- 4.p. Sleep Disturbance

Coupeville, WA 98239

I recognize that OLF provides a means for the Navy to achieve preparedness. I would only comment that I would like to restrict the number of flights to that number which is absolutely and justifiably needed. I would also feel that the Navy needs to put new effort into mitigating the sound impact to the extent possible. Alternate takeoffs to the east and to the west. Do not fly the same pattern over and over passing over the same homes time and time again-especially when flying at extremely low heights. Also the use of after-burners should be limited and pilots should be directed use them sparingly and perhaps only over water. This is not a Top Gun School and the pilots should conduct themselves accordingly.

- 1.a. Thank You
- 2.k. Range of Alternatives
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.t. Noise Mitigation

Coupeville, WA 98239

After study of your draft eis, it is evident to me the Navy is going to do whatever it wants. To assert that increased operations cause no harm to the people in Central Whidbey is absurd. You have made your study reflect the results you desire by clever manipulation. I live near OLF, you most likely don't. I know the damage your operations create physically, emotionally and financially while you hide behind your bogus study. The Navy is an arrogant bully that has lied to the citizenry. You are exercising eminent domain without compensating property owners adjacent to OLF. I hope you are proud of yourselves. You leave my wife and I no choice but to abandon the home we designed and built for our retirement. You have succeeded in disrupting our lives and health in addition to subjecting us to a financial burden associated with moving that we can ill afford on our fixed income. Any respect or support I ever had for the Navy is gone. [REDACTED]

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 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

After study of your draft eis, it is evident to me the Navy is going to do whatever it wants. To assert that increased operations cause no harm to the people in Central Whidbey is absurd. You have made your study reflect the results you desire by clever manipulation. I live near OLF, you most likely don't. I know the damage your operations create physically, emotionally and financially while you hide behind your bogus study. The Navy is an arrogant bully that has lied to the citizenry. You are exercising eminent domain without compensating property owners adjacent to OLF. I hope you are proud of yourselves. You leave my wife and I no choice but to abandon the home we designed and built for our retirement. You have succeeded in disrupting our lives and health in addition to subjecting us to a financial burden associated with moving that we can ill afford on our fixed income. Any respect or support I ever had for the Navy is gone. [REDACTED]

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 12.j. Property Values
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Dec 9 2016  
Coupeville

1. Name [REDACTED]

2. Organization/Affiliation Resident of Coupeville

3. Address [REDACTED] COUPEVILLE WA 98239  
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

Request Delay of finalization of this Draft EIS in its current form because

- Navy's conclusion that Growler scale-up and concentration of all USA EA-18G aircraft to NAS Whidbey is appropriate and due to military vulnerability of isolation of NAS should Deception Pass bridge and w/ Highway 20 from Fidalgo Island to IS be destroyed in earthquake, tsunami or foreign attack is misinformed. Navy's conclusion that placing 80% of EA-18G scale up and moving from 60% current 2016 to 35% in 2017 will be consistent with safe noise exposure of Coupeville and Central Whidbey residents.

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

Navy's conclusion that OLF scale up does not pose threat - residents think noise is worse than to contain

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

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~~contains~~ 60 ppm of carcinogen in flame retardants  
used when aircraft crash (Toxic level is 1ppm)  
(- 05/08/2016)

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

Olympia, WA 98506

REally!!! AGain!!! Why must the US Navy use our pristine and unique environment to base more of these airplanes? We need more time to address the environmental impact of this proposal.

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



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 RESIDENT  
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](http://www.QuietSkies.info)*

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

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

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

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

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

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

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

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

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

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

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- 12. Add your own comments here:

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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.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
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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 [redacted]
6. Please check here [X] if you would NOT like to be on the mailing list
7. Please check here [X] if you would like your name/address kept private

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

### January, 2017 Comments

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

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
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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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**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.  
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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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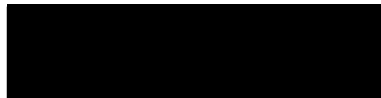
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**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

*I support all of these actions recommended. The impact of these airplanes on our lives here in the islands is unbelievably intense. The weapon of fierce sound is being used against our own citizens. These airplanes should only fly over deserts and low population areas.*



**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](http://www.whidbeveis.com)

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

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

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

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.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.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

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeveis](http://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.**
- 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:

I have an Air STRB that I can't rent when planes are flying. My guests are not Navy. They are bike-touring, outdoor recreationalists or attending the art's center. They come to Coupeville for natural history, culture, pastoral environment & peace & quiet. This expansion effects my business & all of Coupeville. People want come visit.

What else you can do

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

## To Learn More

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

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



Coupeville, WA 98239

I would like to comment on the effects of the EA-18G growler jets flying at OLF. -when the jets are flying over my house and work place, I wear double hearing protection, the inner ear foam plugs and the over head ear muffs. Within a few minutes of jets flying my ears begin to ring and continue to ring until jets either cease or I go inside. My work is mostly outside so I cannot escape the damaging sound, and when I am home I wish to work outside. I do not have ringing ears from any other sound generating tasks like mowing the lawn while wearing earing protection. My work and hobbies do not generate much loud noise other than the use of occasional gas powered tools for yard work. I have audiology tests done every year by my employer. So I have a record of my hearing ability for the last 13 years, if I do not suffer any hearing loss due to other loud noises other than the 100+ decibel sound of the jets, then there is a very good chance if my hearing record shows a decline in hearing ability, that jet noise is the cause. My hearing tests show I am losing a little hearing acuity, I am very concerned that increasing the flight episode # would cause irreparable hearing loss. This is a measurable negative effect that jet noise has on me a citizen of Whidbey Island. -I have an AirBnb rental on my property of which I rent out my space for tourists and students who come mainly to see Coupeville and the nearby parks or attend the Coupeville Art School. The 100+ decibel noise from jets would simply not be acceptable to a typical person coming to stay at my place which is advertised as a peaceful and quiet getaway. This is income lost for me, and the businesses of Coupeville. This is another measureable negative effect that jet noise has on local business. -In living in Coupeville for 13 years, of the people I have met or entertained most of the people by far that come here whether friends, family or visitors ,come for the beauty and serenity, that the parks farmland and historical preserve offer and the charm, peace and quite that the Coupeville area offers. The flights of the EA-18G growlers at OLF do not represent or conform to the character of central Whidbey. I vote for all the visitors, friends and family who came here and can't respond to the Navy EIS, that no more flights at OLF occur so that friends, family and visitors will come for a positive memorable experience.

1.a. Thank You  
12.c. Socioeconomic Impacts  
12.h. Tourism  
4.q. Potential 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](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

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

1. Name

2. Organization/Affiliation citizen

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

The EIS will not be valid unless and until actual measurements of noise levels ~~with~~ are measured on Lopez. We live on the North End and experience conversation-stopping, sleep impairing noise when Growlers fly over. This has NOT been accounted for in the draft EIS.

NONE of the alternatives are acceptable. A no action alternative is not even being considered. This is a travesty of the EIS process.

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.j. Property Values
- 12.n. Quality of Life
- 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.t. Noise Mitigation

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There is no ~~no~~ consideration of quality of life. The current operations have impacted our life - increased numbers will only make it worse. Property values have decreased because of noise levels and property sales have fallen through when the jets fly over. ~~It~~ Clearly there has already been an economic impact and it is only going to get worse. That has not been adequately considered in the EIS.

The no action alternative has to be seriously considered. ~~There~~ One alternative should be moving all Growler operations to a less inhabited part of the country.

Your own flawed noise analysis shows that there will be an increase in sleep-disturbing indoor conversation stopping and classroom interrupting noise disturbances. This is simply not acceptable. We are already experiencing too much noise from Growlers.

Why is not one alternative something other than Growlers - eg unmanned drones. ~~But~~ Put the money into developing new technology eg unmanned UCAV jets. The alternatives considered are not adequate.

When will we get a hush house? We needed one years ago - when the growlers arrived.

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

Please print

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Naval Facilities Engineering Command Atlantic  
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**YOUR INPUT MATTERS**

1002860.0041.10

Whidbey 2016\_Comment Sheet.at-GR-6/23/16

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 including the San Juan Islands. 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. In addition to averaging, determine the instantaneous noise levels experienced by people living in the region, e.g. South Lopez, Coupeville, Anacortes. Humans experience the noise occurring at the moment while they are trying to talk or sleep, not as an average over a day. 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. Real estate values on South Lopez have already been impacted, and real estate sales contracts now include a disclaimer that the property may be impacted by aircraft noise from NASWI. 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI.

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12.a. Socioeconomic Study Area

12.h. Tourism

2.c. Compliance with the National Environmental Policy Act

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4.j. Other Reports

4.r. Nonauditory Health Effects

4.t. Noise Mitigation

7.h. San Juan Islands National Monument

While some potential noise Mitigation Measures addressed, there is no commitment. ACTION: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision. 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion." ACTION: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.

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

January, 2017 Comments

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7.h. San Juan Islands National Monument

1. First Name [Redacted]
2. Last Name [Redacted]
3. Organization/Affiliation Lopez Island
4. City, State, ZIP Lopez Island 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 [X] 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

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- 12. Add your own comments here:

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San Juan Island, WA 98250

Please please consider the people living in the area of Whidbey island. In the name of national security our quality of life is being diminished unecessarily. There has to be a way to allow the planes to fly without risking our quality of life. Can we focus on a muffler system for the planes? count me as one more disgruntled islander and please DO what you can to reduce the terrifying noise. Noise levels should only be .averaged over active flying days!

- 1.a. Thank You
- 12.n. Quality of Life
- 4.d. Day-Night Average Sound Level Metric
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.t. Noise Mitigation

anacortes, WA 98221

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

I support EA-18Gs and understand the importance of the Growler mission. I own a home underneath the pattern for NASWI and understand the importance of the training required by EA-18G aircrew. I recommend and support 80% of EA-18G FCLPs be conducted at OLF Coupeville, since OLF Coupeville's pattern is very similar to what aircrew encounter at the aircraft carrier and it is a better training environment than Ault Field.

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

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Increasing touch and goes at the OLF is an unacceptable proposition. As a Navy spouse, I've lived for the past twenty years under the flight path of Navy jets. I understood at each location exactly what I was signing up for. And I lived near the base. Coupeville is NOT a base location, it is a rural community. The residents of Coupeville selected to live in a town without the base and all that goes with it. It is inappropriate to increase the number of touch and goes at the OLF. Ault Field was and remains the appropriate location for the bulk of operations. I have no issue with continuing the current level of operations at the OLF, but the OLF is not a base. It should remain a supplemental support air strip.

1.a. Thank You

Oak Harbor, WA 98277

We need the OLF to continue to have our pilots trained to the best of their abilities. I strongly support and urge all veterans and civilians to keep OLF open.

Seattle, WA 98144

To whom it may concern, I am deeply concerned about the Navy proposal to conduct war games and trainings in the Olympic National Forest with 5,000 "events" a year. Growler planes which will be used in these exercises 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. This plan is terrible for people, for wildlife and, given the amount of fuel used in the Growlers, for the planet. As a person of faith and as a mother, I believe that what the Navy is planning to do is unconscionable. Please listen to the public and please consider the HEALTH and future of the children of Washington State. This plan must be stopped. Sincerely, [REDACTED]

- 1.a. Thank You
- 19.d. Electronic Warfare
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 6.b. National Ambient Air Quality Standards Compliance

1.a. Thank You

LaConner, WA 98257

I own property in LaConner & I hope you get the BIGGEST BADDEST aircraft the world has ever known & fly them whenever & where ever you want! The noise does not bother me, in fact I like to hear it. Please ignore these people who complain, They don't remember WWII. I do, my brother died in a Jap prison camp!



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

Coupeville, WA 98239

I have lived here since 1962. I have sold real estate in the Coupeville OLF area since 2002. In the Town of Coupeville for the last 10 years the median sales price has been \$287,750 and there have averaged 19 sales. In the last two years (2015 & 2016) the median sales prices have exceeded the 10 year average and the # of sales have exceeded the same 10 year average. In the vacant land category (vac land sales are DOWN all over Western WA), the average # of sales in all of Central Whidbey in the last ten years has been 36.5/year. In the past two years it has been 41 (2015) and 52 (2016)...dispelling COER's myth that the Growlers have negatively impacted real estate. Additionally, the Growler is only 3dB louder than the Prowler (by test). Central Whidbey historically has been a friend of the US Military (think of the big guns and mortars at Ft Casey) and between the County and those of us in the real estate profession not a single person that I know of have ever been sold a home or lot without being made to sign a NOISE DISCLOSURE statement which uses the two descriptive words "significant noise." Michael Monson's lie about his Realtor not making him sign this disclosure was brought to light by the Whidbey News Times without an apology for his deceit toward his Realtor. COER's history of lying, bullying, intimidation and their frivolous lawsuits have cost taxpayers millions as the US Navy has had to make squadrons and their mechs travel to places like El Centro, CA to conduct critical training which could be done right here at the OLF designed, paid for by taxpayers for our own local squadrons. Shame on COER who put their own self-serving interests ahead of the nation. Historic uses of the Coupeville OLF have probably averaged over 18,000 operations/year, and many times between 20,000 and 30,000+ in the past. I hope the EIS members will take the time to see through this smoke screen and recommend the OLF be used for which it was designed: to train the best carrier pilots in the world.

seattle, WA 98136

The people and children of whidbey island deserve better. They deserve clean water and air. They also deserve to live where they don't have to constantly have to put up with the sound pollution caused by low altitude flybys. There are many alternatives for training opportunities for the naval personnel that does not endanger the civilians whose tax dollars pay not only the salaries but fund the armed services.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.n. Alternatives Considered But Eliminated
- 6.b. National Ambient Air Quality Standards Compliance

1.a. Thank You

[REDACTED]  
Bainbridge Island, WA 98110

February 19, 2017

EA-18G EIS Project Manager

Naval Facilities Engineering Command ( NAVFAC) Atlantic

6506 Hampton Blvd

Norfolk, VA 23508

Attn: Code EV21/SS

To Whomsoever It Might Concern,

Thank you for extending the comment period to February 24, 2017 concerning the Navy's activities in the Pacific Northwest, Olympic Peninsula, Olympic National Park, and the people, wildlife, ecosystems, and other biological resources that may be affected by them.

I write to urge you to cease EA-18G Growler practice, wherever it is, and put the Navy's might and science toward the work of repairing our planet's systems.

I don't know much but there is one thing I'm sure of. War is outmoded and unnecessary at this time in human evolution. Our small planet cannot survive more battles, more toxicity, more disruption to natural systems. The consequences of the new Growler technology cannot be foreseen. We humans are not brilliant enough. Let us learn from our experience with underwater sonar – unintended consequences have wreaked havoc on the deep waters we are all dependent on for oxygen...The systems that keep our planet providing for life are complex and interdependent and they've been stressed to the limit.

Please consider putting war funds into green technology projects...new jobs, new explorations. Please cease and desist the call to greater destructive madness. Consider all the lives at stake, including our own.



Port Townsend, WA 98368

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

Greetings: Please extend the deadline for submitting comments for an additional 36 days

Freeland, WA 98249

I am very concerned that the environmental impacts of the following issues due to increased flight operations at the OLF are not adequately address in the draft Environmental Impact Statement: - health effects from noise and low-frequency sound on residents, marine and terrestrial life and those involved in businesses, agriculture, schools, hospital, and County and Town public government facilities, particularly in the Coupeville area but also in other communities on the South end of Whidbey Island; - a decrease in tourism and private property values because of the noise; - an increase in risk of contaminants in aquafer and wells. I am also concerned about the increased security risk of residents of Whidbey Island as well as the potential for more mishaps and crash risks.

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
12.e. Agriculture Analysis  
12.f. Economic Hardship and Impacts  
12.j. Property Values  
12.n. Quality of Life  
2.f. Use of Public Comments  
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

Mount vernon, WA 98273

The levels of noise we are living with is increasingly intolerable at my home in Bay View on Padilla Bay, and it is not even indicated on your map of affected areas. We cannot conduct conversation indoors when the flyovers are close to the house. We are awoken from sleep with close flyovers. We raise our voices in strong objection to increasing the numbers of growlers and overflights of our home in western Skagit Valley and our state park Deception Pass on Whidbey Island. We also object to the noise of conducting practice warfare over wilderness in our mountain and coastal areas of Olympic National Park and the North Cascades, the US Navy Growlers do not make the Navy a welcome neighbor, and the timing and behavior of your flight paths seem to disregard lives of the the population you serve. Please do not add additional noise and flights and growlers to Whidbey island and western Washington. Very sincerely yours, [REDACTED]

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 9.a. Consideration of Tribes

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, 6<sup>th</sup> CD, WA State

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

**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, 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.

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:

There ~~is~~ is no justification for not seriously addressing these concerns including water contamination issues in the EIS and considering alternatives or providing real solutions before proceeding with this expansion.

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

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

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

Mossyrock, WA 98564

Please, stop this plan to do warfare training over our beautiful Olympic Peninsula. Our forests are not only retreats for humans but they are the homes of thousands of species of wildlife. I have hiked and ridden my horses in these areas since I was a child and these areas are one of the few remaining areas that a person can go to for reprieve from the noise pollution of the city. Please don't bring this pollution to our forests.

1.a. Thank You

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

19.d. Electronic Warfare

1.a. Thank You

coupeville, WA 98239

Let them fly!

1.a. Thank You

Oak Bay, British Columbia V8P 1B9

Please don't tar all of us Canadians with the same brush. Some people having nothing better to do with their time, including the Mayor of Oak Bay, than to whine and complain. For me, the sound I hear coming from the Growlers is that of peace, safety and security. Thank you!

## 1.a. Thank You

Oak Harbor, WA 98277

My first husband was cut short on his training because he was needed on the carrier. Two weeks later he was killed. This is why I feel it is so important that these men are trained as much as they need. I would not want any other family to know the pain I have gone through. It is not worth the lives of these men and women who are laying their live on the line every day for all of us to know the freedom we have. I have a difficult time listening to all of their complaints when we have to live everyday wondering if our loved ones are okay or the rest of our lives without them, just because someone chose to live where they live. I know from where I speak, I also have a grandson who flies the F-18.

port angeles, WA 98363

I have many, many concerns over your proposed actions with the Growler Airfield operations and will submit several comments. One huge concern is the fact that you have NO ALTERNATIVE with NO additional Growler jets. ALL of the alternatives assume 34-36 additional jets and do not acknowledge the fact that an alternative should have NONE and that since you are planning an ADDITIONAL 42 jets not even mentioned in this EIS, you should have an alternative with 70+. You are being duplicitous, dishonest. How can we trust the Navy? I am deeply concerned that you have no EIS that acknowledges that your many separate plans for the Olympic Peninsula are coordinated and together will cause even more extensive harm to us humans and the Wilderness with its wild creatures and precious silence. You seem to have no respect for Silence and a rural way of life, and you seem to think that this is the easiest target to overcome in forcing your plans on the public. I also am concerned that you are not studying noise in places other than the spaces around the airfields where you will take off and land. Of course I am concerned for those spaces and the mental anguish, loss of hearing, and loss of property values you would be causing with these jet take-offs and landings. But I am also concerned for the noise we are already experiencing on the Olympic Peninsula, as I am ALREADY experiencing noise either high or low in the sky that alarms me and provokes me---and you have plans to increase flight operations from 6100 to 35,100 or maybe more with 70+ jets??? How about our Wilderness area, used by humans in need of silence as well as wild creatures that can only be adversely affected. Do you have such arrogance that you think these jets are more important? Your EIS is incomplete and missing many points that need to be taken into consideration. These are a few. [REDACTED]

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 10.a. Biological Resources Study Area
- 12.j. Property Values
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.k. Range of Alternatives
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.l. Points of Interest
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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

December 7, 2016

To Whom It May Concern:

I have watched as two families who have lived on Lopez Island, WA, for generations are seriously considering leaving their homes because the EA-18G Growler noise is unbearable. These are valued community members whose families all predated the Growlers, and who are heart-broken about needing to leave their homes. It is unconscionable that the military has so violated and invaded valued citizens' lives that they are driven from their beloved homes in the U.S.A. Clearly the EIS is severely flawed in that it not only perpetuates this invasive violation, but seeks to increase it.

To state the obvious:

1. The noise analysis was based on a flawed, outdated noise simulation model, and therefore scientifically and legally indefensible. [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> and 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>.]
2. Even if the computer model was good, the lack of transparency around the "library of noise measurement data" from which the model draws makes it very difficult to assess the credibility of the simulation results.
3. Based on assessments by Naval Research Advisory Committee (NRAC), it appears that the Navy has no consistent measurement methodology and standards, no well-maintained jet noise database, and lacking noise data measurements. To be compliant with NEPA and related laws, the Navy should therefore conduct its own noise measurements on the Growler operations and consider the community noise measurement data.
4. NRAC put forward several operational strategies for jet noise reductions (e.g. "cutback" (slower climb) and elimination of afterburner use during takeoff) that should be incorporated as noise reduction measures in the EIS.
5. The EIS should provide more complete and easily accessible presentation of noise assessment results.
6. As a measure of accountability, the Navy should consider ongoing noise monitoring and making annual noise reports, as exemplified by the Australian Super Hornet noise report.
7. The 1500-page draft EIS is not in compliant with the CEQ regulations of maximum

- 1.a. Thank You
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 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.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

300-page limit. At a minimum, the Navy should give citizens more time to review the draft EIS.

I also encourage the Navy to undertake a Supplemental EIS in accordance with CEQ Regulation 1502.9(c) <https://ceq.doe.gov/nepa/regs/ceq/1502.htm#1502.9>.

The following questions need to be addressed:

- Why isn't C-weighting noise monitoring also used throughout the EIS?
- What are the impacts of the low frequency vibrations such as what the Growlers produce, on residents of Whidbey and Lopez Island and other human beings?
- What are the health effects of the Growler noise on the residents of Whidbey and Lopez Island, or its equivalent on other human beings?
- Why is the Growler not designed to be more on the "stealth" scale than the high noise scale.
- What is the impact of this expansion on Whidbey Island Schools?
- What is the impact of this expansion on housing on Whidbey Island?
- What is the impact of this expansion on human services on Whidbey Island?
- What is the impact of the Growler noise on children and babies trying to sleep, since these planes fly well after 7 p.m., sometimes until 1 a.m. over populated areas.

I ask that you do the following:

- (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 (drones) instead of more Growlers.
- (6) Commit to Mitigation Measures and timelines in the Record of Decision.

I cannot express adequately what a travesty is being thrust upon innocent U.S. citizen lives on Whidbey and Lopez Island.

I ask your sincere cooperation in at least mitigating this travesty.

[REDACTED]

Lopez Island, WA 98261

[REDACTED]

[REDACTED]



Lopez Island, WA 98261

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

Please extend the deadline for comments on the Final EIS for increasing Growlers at NAS Whidbey.

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

December 7, 2016

To Whom It May Concern:

I have watched as two families who have lived on Lopez Island, WA, for generations are seriously considering leaving their homes because the EA-18G Growler noise is unbearable. These are valued community members whose families all predated the Growlers, and who are heart-broken about needing to leave their homes. It is unconscionable that the military has so violated and invaded valued citizens' lives that they are driven from their beloved homes in the U.S.A. Clearly the EIS is severely flawed in that it not only perpetuates this invasive violation, but seeks to increase it.

To state the obvious:

1. The noise analysis was based on a flawed, outdated noise simulation model, and therefore scientifically and legally indefensible. [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> and 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>.]
2. Even if the computer model was good, the lack of transparency around the "library of noise measurement data" from which the model draws makes it very difficult to assess the credibility of the simulation results.
3. Based on assessments by Naval Research Advisory Committee (NRAC), it appears that the Navy has no consistent measurement methodology and standards, no well-maintained jet noise database, and lacking noise data measurements. To be compliant with NEPA and related laws, the Navy should therefore conduct its own noise measurements on the Growler operations and consider the community noise measurement data.
4. NRAC put forward several operational strategies for jet noise reductions (e.g. "cutback" (slower climb) and elimination of afterburner use during takeoff) that should be incorporated as noise reduction measures in the EIS.
5. The EIS should provide more complete and easily accessible presentation of noise assessment results.
6. As a measure of accountability, the Navy should consider ongoing noise monitoring and making annual noise reports, as exemplified by the Australian Super Hornet noise report.
7. The 1500-page draft EIS is not in compliance with the CEQ regulations of maximum

- 1.a. Thank You
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 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.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

300-page limit. At a minimum, the Navy should give citizens more time to review the draft EIS.

I also encourage the Navy to undertake a Supplemental EIS in accordance with CEQ Regulation 1502.9(c) <https://ceq.doe.gov/nepa/regs/ceq/1502.htm#1502.9>.

The following questions need to be addressed:

- Why isn't C-weighting noise monitoring also used throughout the EIS?
- What are the impacts of the low frequency vibrations such as what the Growlers produce, on residents of Whidbey and Lopez Island and other human beings?
- What are the health effects of the Growler noise on the residents of Whidbey and Lopez Island, or its equivalent on other human beings?
- Why is the Growler not designed to be more on the "stealth" scale than the high noise scale.
- What is the impact of this expansion on Whidbey Island Schools?
- What is the impact of this expansion on housing on Whidbey Island?
- What is the impact of this expansion on human services on Whidbey Island?
- What is the impact of the Growler noise on children and babies trying to sleep, since these planes fly well after 7 p.m., sometimes until 1 a.m. over populated areas.

I ask that you do the following:

- (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 (drones) instead of more Growlers.
- (6) Commit to Mitigation Measures and timelines in the Record of Decision.

I cannot express adequately what a travesty is being thrust upon innocent U.S. citizen lives on Whidbey and Lopez Island.

I ask your sincere cooperation in at least mitigating this travesty.

[REDACTED]  
Lopez Island, WA 98261  
[REDACTED]

8

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

*February*  
January, 2017 Comments

*ryan*

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.c. Socioeconomic Impacts
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered but Eliminated
- 4.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

①

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

January, 2017 Comments

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

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

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

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

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

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

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

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

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

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

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

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

- 12. Add your own comments here:

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### 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]*<sup>1</sup>

The Draft also states that the total number of Growler Aircraft at Ault Field will be 117 or 118.<sup>2</sup>

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 ...<sup>3</sup>

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<sup>4</sup>

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?

<sup>1</sup> Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex Volume 1, pg. Abstract-1

<sup>2</sup> *ibid*, Table 2.3-1

<sup>3</sup> 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>

<sup>4</sup> *ibid*, pg. 37

3

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.a. Thank You  
4.t. Noise Mitigation

Victoria, British Columbia V8R 4j3

Thank you for your service to America and freedom loving allies, including Canada. My request is that for the USAF to take all reasonable measures to reduce instances of, and to mitigate the noise and rumbling vibrations from, training missions or other flights outside of war zones. The low rumbling noise from the Growler Airfield Operations is disconcerting and impossible to avoid especially for residents on east side of Victoria. Peace of mind is impacted, especially in tranquil moments when the rumbling sound reminds people of war and destruction.

Anacortes , WA 98221

1.a. Thank You  
3.a. Aircraft Operations

I heard new routes/flight patterns are under consideration. I would like to request fewer over Anacortes, please. Thank you!

Coupeville, WA 98239

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 2.m. Record of Decision/Preferred Alternative

To Whom it may concern: I have three businesses in and around Coupeville and more noise from the OLF will be devastating to my businesses. I am a supporter of our military and the Navy is an integral part of my businesses. My kids and grandchild live here and the noise , if the 80/20 split occurred would be unbearable. The current noise level and the current amount of flights has been tolerated only because I knew what to expect over the past 30 years living here. The new planes are way louder from my house and at work. Please do not adopt the 80/20 policy for flights around Coupeville. Thank You [REDACTED]



# Public Meeting Comment Form

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

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

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

1. Name

2. Organization/Affiliation

3. Address  Couperville VA 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

The average 65 decibel day & night is ~~120~~ <sup>deceivingly</sup>. That would mean it could be 120 decibals + then 0 for 12 hours & that it would justify the loud overwhelming noise. You can't talk on the phone, you can't watch T.V. you can't go to sleep because every 5-10 minutes a loud blast fly's over head. The no change option should be exercised. Anything else would be a crime against citizens of Couperville. The Navy needs to look for an updated area further out in remote places & not where a large growing community

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.j. Property Values
- 2.l. No Action Alternative
- 4.a. General Noise Modeling
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance

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 a large bedroom community to Seattle is increasing in size annually. look to the Desert of eastern Washington or remote place that Whidbey once was in 1942 when the OLF was built. It's a fine cry now from then + property values will suffer for anyone in this area. that is not why we moved to Whidbey to lose money on our house + property.

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

Please print

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

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

**YOUR INPUT MATTERS**

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 misconception has to be credibly revised to properly characterize the real impacts.



Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

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

Coupeville, WA 98239

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

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

Coupeville, WA 98239

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

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Coupeville, WA 98239

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

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Coupeville, WA 98239

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

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

13.a. Environmental Justice Impacts

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

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

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



Coupeville, WA 98239

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

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

Coupeville, WA 98239

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

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

Coupeville, WA 98239

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

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

Coupeville, WA 98239

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

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

Coupeville, WA 98239

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

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

Coupeville, WA 98239

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

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

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

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

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

**Open House Comments**

Fill in and Submit at the Open House

1. Name [REDACTED]

2. Organization/Affiliation Lopez Island citizen.

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
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.e. Field Carrier Landing Practice Patterns
- 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
- 6.f. Fuel Dumping
- 7.h. San Juan Islands National Monument

**Comments**

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

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

Please reduce Field Carrier Landing Practice near Lopez.

Please recognize the impacts of fuel dumping and stop (Continue on the back) doing so near Lopez - and if possible eliminate them completely.



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)  
*retired Boeing*

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  
*pls on list pls*

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)

- 1.a. Thank You
- 11.a. Groundwater
- 11.b. Floodplains and Wetlands
- 11.c. Marine Waters and Sediment
- 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.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

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

Please include any additional comments here:

Water!

Be concerned w/ what the people care about

## What else you can do

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

## To Learn More

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

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

Seattle, WA 98108

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted


Please consider the lives and livelihood of the people and animals living in this area! We deserve a healthy environment for our children. This project is not necessary to protect our safety as citizen, rather it harms us!

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 San Juan County resident

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

5. E-mail 

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

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

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

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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 12. Add your own comments here:

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

*February*  
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 \_\_\_\_\_ *Whidbey 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
- 18.a. Climate Change and Greenhouse Gases
- 18.b. Average Carbon Dioxide per Aircraft
- 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
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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**  
FEBRUARY  
**January, 2017 Comments**

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

PLEASE NOTE THE ONLINE LINK TO THE SAN JUAN COUNTY NOISE REPORTS IS: SAN JUAN COUNTY JET AIRCRAFT NOISE REPORTING.

THERE ARE OVER 6,500 NOISE COMPLAINTS RECORDED BY SAN JUAN COUNTY RESIDENTS IN LAST 3 YEARS. COMPLAINTS ARE

01/08/16

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

NOTATED ON A MAP OF ISLANDS. FOR MORE DETAIL CONTACT NICK PEHL OR 360.390.7413 (GIG COORDINATOR. (NICK@SANJUANCO.COM.) HE MAINTAINS THE MAP,



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.**

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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:

13. EVALUATE THE ECONOMIC IMPACT ON THE SAN JUAN COUNTY

TOURISM INDUSTRY - THE MAIN INDUSTRY OF S.J. COUNTY.

14. EVALUATE THE INCREASE IN CO<sub>2</sub> LEVELS DUE TO EMISSIONS

FROM FOSSIL FUEL COMBUSTION FROM GROWLER FLIGHTS OVER

SAN JUAN COUNTY.

Victoria, British Columbia V8S 4J3

1.a. Thank You  
4.p. Sleep Disturbance

I have been repeatedly woken in the night, at least 3 times in a single night, one hour apart, from the distinct sound of the airplanes from Whitby Island.

1.a. Thank You

Nanaimo, British Columbia V9T 6L2

I am totally shocked at the proposals being considered as to the air and ocean noise pollution. I think it is reprehensible that things have gone so far to even think it is OK to do these things. It will be negative for all concerned, people and animals and all nature. Have any of you read Rachael Carson's book " Silent Spring"? It is not only chemicals that pollute!

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] *psychologist*  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*resident and citizen of WHIDBEY ISLAND*  
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
- 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
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- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

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

**Additional Concerns:**

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

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

neural, electromagnetic and hormonal systems of the human body are adversely affected by the Growlers training being located in a populated area. This was not addressed in the OLF EIS report. Also, the contamination of water supply makes the whole location of the Growler training absolutely unconscionable.

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

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

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



FROM:

[REDACTED]  
LONGLEY, WA 98260DATE  
02/06/17TO: Decision Makers regarding  
the Future of Coupeville, Washington

As I have been learning about  
the impacts of the Navy's Draft  
Environmental impact statement  
the following emerges:

During the 1970's I lived on Birchell  
Road in the flight path of the  
- Prowler fighter jets which  
flew until around midnight  
with great regularity. The sound  
would rattle the whole house.

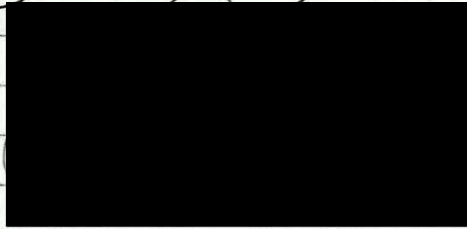
The current Growlers are  
times louder and with much  
more serious impact on this  
central Whidbey Island  
community. From reading the  
Draft EIS, the statistics  
on decibels that residents experience  
is increased as it represents an  
average - which includes non-flying  
days and thus lowers the  
decibels by over half - from  
115 to 55.

As a psychologist, the  
neural, hormonal and electromagnetic

Effects on the 1800 children and adults within the Fly zone is enough to re-consider the prudence of the decision to increase current 6,000 flights per year to 35,000!

The long term Post Traumatic Stress Disorder on all of these people just seems unconscionable!

Respectfully  
Submitted,





**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 and resident of Whidbey Island*
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.

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(over)

- 1.a. Thank You
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- 10.m. Impacts to Marine Species and Habitat
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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

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

As a psychologist, I am very concerned about the post-traumatic stress effects upon a community of more than 3,500 men women and children who will be exposed to the noise and environmental pollution of 35,000 Growler flights each year. It also places the entire population of Whidbey Island at enormous security risk due to the majority of Fighter Jets (Growlers) being located 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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Port Townsend , WA 98368

Dear Sirs and Madams, I am writing to tell you how disappointed I am in all the procedural violations the navy has done in initiating the changes in Growler jet on the Olympic Peninsula. Also the I think the notion of calling the proposal "Alternatives" is a blatant lie. Each one results with basically the same total increase in hours 4100plus. Try to be more honest and show more integrity. Where are the other real options. The military always takes the moral high ground and talks about the importance of its mission, but it is not living up to its own standard in this case. Don't be so shameful. Be honest. Of all the proposals I favor the No Action Alternatives (which I was told by military member at a local meeting was not a real option). Of all the false alternatives that we have to choose from I favor scenario C in each case. This keeps the bulk of the planes in Oak Harbor where they belong. Better yet send the planes back to Idaho were they were flying before. One of you military presenters told me he lived by LAX and it wasn't so loud. That shows how out of touch the military is with the lives and community values if the people living on the Olympic Peninsula. And next time have a real community meeting at times when working people can attend instead of ending at 6:00. The way you ran the meetings seemed like a real cop-out. Surprising to me. Thanks, [REDACTED]

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.l. No Action Alternative
- 2.m. Record of Decision/Preferred Alternative

Port Townsend , WA 98368

Dear Sirs and Madams, I am deeply dissapointed in the Navy and the armed forces in general. They seemed to have blatant disregard for the people they are sworn to protect. You seem to care little for our communities and less for the natural world around us. The increase in jet noise and electromagnetic radiation and sonar and air and water pollution you are proposing is unacceptable. Please stop treating our home like an area to be invaded. Also, will you compensate us for the lost property values? No. You not keeping us safe. Don't lie to yourself. Please stop the Growlers and the assault on our communities and one of the crown jewels of our national park system. Also, WHAT IS A FAIR PUBLIC PROCESS? In order for the Olympic Peninsula to be turned into an Electronic Warfare Range, the Navy and Forest Service must first follow the law. They have not. The National Environmental Policy Act of 1969 (NEPA) has been violated multiple times. So has the National Forest Management Act. How? 1. The Navy has segmented its public process into many confusing pieces, making it almost impossible for the public to follow and understand. 2. They did not notify the public about their Environmental Assessment, and as a result, received no public comments. Only people who comment during the specified time have legal standing to mount a challenge. 3. The Forest Service is expected later this month to announce that it is adopting the Navy's claims of no significant impacts despite serious procedural and biological flaws, without conducting its own scientific investigations, and despite 4,000 public comments, all but 31 opposed. Is that fair? Most people would agree that regardless of how anyone feels about jet noise or electromagnetic radiation or sonar or air and water pollution, a FAIR PUBLIC PROCESS is in everyone's interest. Aren't you supposed to represent liberty and justice? Do the right thing. Cancel this process. Thank you, [REDACTED]

1.a. Thank You

19.d. Electronic Warfare

2.c. Compliance with the National Environmental Policy Act

2.e. Public Involvement Process



# Public Meeting Comment Form

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

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

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

1. Name [REDACTED]

2. Organization/Affiliation [REDACTED]

3. Address [REDACTED] Pat Townsend WA 98368

4. E-mail [REDACTED]

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

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

The hours of this meeting does not meet the needs of working people! Why? Please schedule a meeting that runs later so people can be here.

Please do not disregard the people/communities of the greater Olympic Peninsula! We do not want this destruction to our environment caused by this operation.

Please listen to the email and testimony you receive. I support a reduction in 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
- 10.a. Biological Resources Study Area
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.n. Alternatives Considered But Eliminated



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

•> I support a reduction or removal of growlers from our region.

•> I believe they are destroying the fabric of our communities w/ their noise pollution.

•> I believe the growlers disregard out special national parks.

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

Please print

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

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

**YOUR INPUT MATTERS**

1002860.0041.10

Whidbey 2016\_Comment Sheet ai-GRA-6/23/16

Seattle, WA 98104

I am strongly opposed to a Growler Airfield being operated off of Whidbey Island. These plans would adversely affect the residents of the island and Seattle area with the increased noise (150 decibels of sound, above the 110 decibels that causes permanent hearing loss and stress in humans and wildlife). These plans also tie in with warfare games over the Olympic National Forest and National Parks, which are high traffic tourist areas sensitive wildlife protection zones, which are highly inappropriate for staged warfare actions. This is unsafe for visitors and closing the park for these games would disrupt significant business and tourism dollars to the state and residents as well as denying citizens access to their own public lands. In addition, increased games and use of these jets means that we will be increasing our state's carbon emissions significantly. Each jet burns 1304 gallons PER HOUR and produces 12.5 metric tons of CO2 per hour, 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). The Washington Department of Ecology already has the state in violation of air quality standards with emissions currently at 106% above 1990 targeted levels. Thank you for your time, [REDACTED]

- 1.a. Thank You
- 18.b. Average Carbon Dioxide per Aircraft
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 7.d. Recreation and Wilderness Analysis and Study 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)  
Clinton resident

3. Address [REDACTED], Clinton, VA

4. Email [REDACTED]

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

**Comments**

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

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

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

(over)

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 10.b. Biological Resources Impacts
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.d. Arrivals and Departures
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.b. Overtasking/Overloading of Air Traffic Control at Ault Field and Elsewhere

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

**Additional Concerns:**

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

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

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

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

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



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

**From:** [REDACTED]  
**Date:** February 21, 2017 at 6:19:52 PM CST  
**To:** [REDACTED]  
**Subject:** Fwd: Disclosure Deception Ruling Just dropped!

**Subject:** Disclosure Deception Ruling Just dropped

Here ya go: [https://www.courts.wa.gov/opinions/pdf/\[REDACTED\].pdf](https://www.courts.wa.gov/opinions/pdf/[REDACTED].pdf) and [https://www.scribd.com/document/\[REDACTED\].pdf](https://www.scribd.com/document/[REDACTED].pdf)

Case has been remanded for further proceedings.

## 1.a. Thank You

Coupeville, WA 98239

I moved to Coupeville in 2006 and found the jet (EA-6B) noise at the OLF to be objectionable but tolerable (most of the time). Since then, I have noticed that the Navy has seemed to have markedly decreased the frequency of flights at the OLF such that the noise is not a problem for me. Also, routing flights over Admiralty Inlet rather than land has helped immensely. So, from my perspective, the Navy has made a real effort to minimize jet noise at the OLF over the past several years, but if there is a multi-fold increase in flights at the OLF, I believe it will become as bad, or worse than it was in 2006.

Coupeville, WA 98239

1.a. Thank You

2.n. Alternatives Considered But Eliminated

Please explain what effect the simulators and "magic carpet" will have on decreasing the need for the OLF, and if no effect, why not?

Coupeville, 98239

- 1.a. Thank You
- 5.a. Accident Potential Zones

What will the dimensions of the APZs be? How will you assure that they will be put into affect?

**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, concerned citizen for future and sustainability of the island and its residents*
3. Address \_\_\_\_\_  
*Langley WA 98260*
4. Email \_\_\_\_\_

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

### Comments

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

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

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

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.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:**

*All of these issues are significant and important to the safety and health of all island residents!*

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

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

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

Prepared by Coupeville Community Allies  
January 18, 2017

[REDACTED]  
 [REDACTED], Coupeville, WA 98239  
 [REDACTED], Freeland, WA 98249  
 Phone: [REDACTED] Email: [REDACTED]

January 5, 2017

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

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

Gentlemen:

I have submitted that the requirements of an EIS as set forth and acknowledged in the referenced have not been met as required. I have not yet shared the above with anyone else to date with the possible exception of my preciously attached letter to Navy JAGC. The JAGC letter has so far not been noted as receipted or acknowledged to me and remains unanswered. This, despite two follow-on calls made by me and two email requests over a month ago now personally made by me to those offices of JAGC headquarters (offices of PAO and Command Master Chief) for calls and to Admiralty Division [only on-line JAGC listed email address] for 2 emails).

On December 20, 2016, I mailed my previous letter to your offices by USPS Priority Mail #9505 5159 085 36355 0648 86 with a complete, conformed copy to Navy JAGC also by USPS Priority Mail #9505 5159 085 36355 0648 79. On-line USPS tracking shows that the letter addressed to you was delivered to your mail room at Norfolk on 12/22/2016 at 10:56 a.m. That for Navy JAG being received in D.C. and in transit to delivery destination 12/22/2016 at 1:01 a.m.

To date, I have received no response or even acknowledgement of receipt of the letter from either your offices and neither from Navy JAGC who/which has never replied in any way.

Please do so now, and also by copy of this letter, Navy JAGC is requested to do likewise to my letter of 11/28/16 to his offices. The earliest response from both your offices and Navy JAGC is required under current circumstances. And to both, please promptly do so with advance copy by email to that address noted at the top above. Also, please provide copies of your responses to the below-noted cc: addressees.

Sincerely,

[REDACTED]

✓ Encl: layout edit copy of page 1 of ltr to NAVFC of 12/20/2015

Cc: w/ encl.  
 Hon. Dennis V. McGinn, Asst. Secy. Of the Navy  
 Hon. Patty Murray, U.S. Senator  
 Hon. Maria Cantwell, U.S. Senator  
 Hon. Rick Larsen, Member of Congress  
 Navy JAGC

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

[REDACTED]  
[REDACTED], Coupeville, WA 98239  
[REDACTED], Freeland, WA 98249  
Phone: [REDACTED] Email: [REDACTED]

December 20, 2016

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

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

Gentlemen:

Let me first introduce myself.

I am a resident of Whidbey Island, my home at the Wahl Road address you see above. I am an honorably discharged former U.S. Navy officer; first as a lawyer specialist active duty reserve line officer and then with the creation of its own corps, automatically a member of Navy JAGC.

I spent 8 ½ years serving on active duty. During that time, while initially serving at NAS Miramar as its station legal officer, I became qualified and flew occasionally in the Station's T-1A jets both in training and cross-country, with one additional flight in an F-4 Phantom on a China Lake practice exercise. My next following duty assignment was to the USS CONSTELLATION (then CVA-64) as her ship's legal officer. During that time I also received a letter of qualification as an Officer of the Deck underway and was additionally the Underway Officer of the Deck at general quarters in WestPac including when on Yankee Station in the South China Sea during the Vietnam conflict. I have, as a passenger, made several carrier take off and landings at sea off the coast of Vietnam. I am unit combat decorated.

After Navy sponsored active duty full-time graduate law study and an LL.M. from George Washington University's National Law Center, I was assigned to Navy JAGC headquarters first serving in its Admiralty and then International Law Divisions, then to duty as Legal Advisor to the Oceanographer of the Navy, continuing after my discharge from active duty as a GS-14 civilian. At this later time, I was also assigned TAD to the Joint Chiefs of Staff and seconded to the National Security Council under Dr. Henry Kissinger. My assigned mission there being "Protection of Scientific Research in Open Ocean Space" in preparation for the U.N. Law of the Sea Conference.

Subsequently, at the specific request of Office of General Counsel of the Department of Defense, approved and coordinated by Navy JAGC's Civilian Legal Advisor, Mr. McIntyre, I was employed as Chief Legal Counsel for the Defense Mapping Agency (now National Geospatial Intelligence Agency) as a GS-15/16.

I have held the highest Top Secret security clearance and have had, as occasion may require, a U.S. State Department diplomatic passport neither of which I have ever abused. I am certain each could be renewed in the event of a need to arise.



Cc: Addresses

Hon. Dennis V. McGinn  
Asst. Secretary of the Navy  
Energy, Installations and Environment  
1000 Navy Pentagon, Washington, D.C. 20350

Hon. Patty Murray  
United States Senator  
2988 Jackson Federal Bldg., 915 Second Avenue, Seattle, WA 98174  
2930 Wetmore 154 Russell Senate Office Building, Washington, DC 205100001  
Ave., Suite 903, Everett, WA 98201

Hon. Maria Cantwell  
United States Senator  
511 Hart Senate Office Building, Washington, D.C. 20510  
915 Second Avenue, Suite 3206, Seattle, WA 98174  
2930 Wetmore Ave., Suite 9B, Everett, WA 98201

Hon. Rick Larsen  
Member of Congress  
2113 Rayburn House Office Building, Washington, DC 20515  
Wall Street Building, 2930 Wetmore Avenue, Suite 9F, Everett, WA 98201

Navy JAGC  
Vice Admiral James W. Crawford III  
1322 Patterson Ave., Suite 3000  
Washington Navy Yard, DC 20374-5066

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.n. Alternatives Considered But Eliminated

[REDACTED]  
[REDACTED] Coupeville, WA 98239  
[REDACTED] Freeland, WA 98249  
Phone: [REDACTED] Email: [REDACTED]

December 20, 2016

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

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

Gentlemen:

Let me first introduce myself.

I am a resident of Whidbey Island, my home at the [REDACTED] Road address you see above. I am an honorably discharged former U.S. Navy officer; first as a lawyer specialist active duty reserve line officer and then with the creation of its own corps, automatically a member of Navy JAGC.

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I have held the highest Top Secret security clearance and have had, as occasion may require, a U.S. State Department diplomatic passport neither of which I have ever abused. I am certain each could be renewed in the event of a need to arise.

I am 76 years old now, but in order to test my mental faculties which I may have personally had some doubt to question for the simple fact of age, after appropriate licensed training and practice, I recently became accepted as a qualified civilian helicopter pilot. Other than 5 weeks of in-patient treatment at the VA Hospital in Seattle for what has subsequently been diagnosed as combat post-traumatic stress syndrome related in 1983, I am in good health and I believe provable sound mind. PTSS seems no longer of any effect on my health.

I think you can see I am very uniquely qualified to make the following comments and observations on the referenced. I am not a member or associated with any group either favoring or disputing the draft EIS.

Growler aircraft, while still in production to satisfy Boeing contractual obligations and most likely airframe-worthy are already in terms of tactic and avionic platform capability, with the advent, development maturity and exiting inventory and production capability of UAVs ("drones") and advancement of cyber tactical platforms, now at present almost, comparatively speaking, as obsolete as a WWII PBY Catalina.

For both public and unclassified, now several years old, see for example the on-line available sources footnoted below. As you can see and as I am sure you all well know, the present platforms already exist and are in present operational usage. They are proven and fully capable of any mission for which the EA-18G "Growler" at NAS Whidbey is currently or can be assigned. At ar lower cost to purchase and operate. Fully capable and with no on-board pilot or attendant flight personal at risk or required. In use, if not destroyed but captured, then as reported yesterday by President Elect Trump to the Chinese government, "Keep it." We cannot do that with a pilot or his remains. We can automatically or on command destroy a UAV with no harm to its remote operating personnel.

In my previous conversations and emails of some five years ago on a separate real estate possibility for the Navy with NAVFAC NW, drone planning for Ault Field was already in process. This is the only thing set forth herein concerning UAVs which is not in the full public domain and so unclassified in any way. That may by now have changed to some other Navy place such as Idaho or another desert location. However it is unlikely there is going to be a need for Growlers at any time or place in the very near future. Certainly not by 2020. The impact presently described in the draft needs to address this situation before having an even greater adverse economic and health affects here on Whidbey.

The requirements of an EIS as set forth and acknowledged in the referenced have not been met as required. I have not yet shared the above with anyone else to date with the exception of my attached letter to Navy JAGC. That has so far been not acknowledged and remains unanswered, despite two follow-on calls made by me and two email requests over the past week personally made by me to those offices of JAGC headquarters (offices of PAO and Command Master Chief) for calls and to Admiralty Division (only on-line JAGC listed email address) for 2 emails.).

Sincerely,

 former LCDR, JAGC, USR

✓  
Cc: Navy JAGC w/ copy of 11/28/16 letter sent to JAG

Examples of a few UAV public domain subject on-line availability:

7 Most amazing Military Aircraft and Helicopters -- You tube (<https://www.youtube.com/watch?v=u-r4QEzFtl&t=216s> see particularly MQ4C Triton segment)

Military Drone Technology today – 2014 –You tube (<https://www.youtube.com/watch?v=hZV8lfjm-MI&t=680s> see particularly Navy X-47 B Drone –USNAS PAX River)

You tube: Autonomous drones: U of PA Navy supported contract: D. J. (Dejay) Kumar operate free of any link and make its own decisions

Wikipedia: The Global Hawk: ([https://en.wikipedia.org/wiki/Modern\\_US\\_endurance/UAVs](https://en.wikipedia.org/wiki/Modern_US_endurance/UAVs))

Aviation Week 12/6/2013

PBY Catalina: You tube PBY: [https://www.youtube.com/watch?v=xMkYzO0\\_By0](https://www.youtube.com/watch?v=xMkYzO0_By0)

PS: I have no interest in as yet unless it affects our house in the contaminated water issue. I recommend you review the recent front page articles in the December 14<sup>th</sup> Whidbey News-Times and December 15<sup>th</sup> Whidbey Examiner and others like it including recent public meetings, Navy sponsored or otherwise. Inclusion in a Draft EIS??

m

[REDACTED]  
[REDACTED], Coupeville, WA 98239  
[REDACTED], Freeland, WA 98249  
Phone: [REDACTED] Email: [REDACTED]

November 28, 2016

Vice Admiral James W. Crawford III, USN  
Judge Advocate General of the Navy  
1322 Patterson Avenue, Suite 3000  
Washington Navy Yard, DC 20374-5066

Re: Whidbey Island NAS Draft EIS\*

Dear Admiral Crawford:

I offer my services to deal with the claims which can be expected as a result of the implementation in 2017 as a result of the impact of the proposed action(s) described in the referenced. I believe this can best be accomplished by me in a variety of acceptable, established ways to the benefit of both the Navy and our civilian community here.

I am currently a resident of Whidbey Island, not in any way impacted by the proposed increased activity at Outlying Field (OLF) and far removed from Ault Field. I am unbiased, not involved yet in any way except as an observer. You will find I am uniquely situated, experienced and qualified for this situation.

At now 76, I am a bit past a return to active duty age, but can be of civil service or equivalent to my former Defense Mapping Agency employment status. I am healthy, fit, still mentally alert and capable. Historically based, in my family, I should last as at present until around 96. My VA records can be of assistance and confirm. You are welcome to check any personal Naval or DOD information to be found through my service or social security numbers shown below.

Very respectfully,

[REDACTED]  
[REDACTED]  
LCDR, JAGC, USNR-R  
USN Ser. # [REDACTED]  
SSAN [REDACTED]

\*For online reference see:  
<http://whidbeyeis.com/files/Public/Whidbey%20Island%20for%20posting/Whidbey%20Island%20EIS%20volume%20I%20Full%20Document.pdf>



Anacortes, WA 98221

1.a. Thank You  
12.n. Quality of Life  
4.t. Noise Mitigation

Most of our complaints come from the close in flights where they are brought in over Anacortes at low altitude during landing practice. Some flights keep clean during their approach over the area of the city and result in much less noise. If you could reduce the noise during this phase of training, I think the whole process would be livable. I have 17,000 hours of flight time and I know this could be accomplished.

COUPEVILLE, WA 98239

My name is [REDACTED]. I have lived in Coupeville for 17 years. I am voicing my concerns regarding the intention of the Navy to increase Growler flights in the Central Whidbey Island area. I trust you will take them to heart. PFA Contamination This first point of concern is unresolved in the current EIS. It is my understanding that the current EIS does not address this issue at all. What is the Navy's plan to continue to test and monitor the contaminated wells? If contamination continues to spread, what is the Navy's plan to recompense those home and business owners that are now affected? It is also my understanding that the Navy has not indicated any current plans to discontinue use of the fire suppressing materials from which the PFA contaminants seems to be most likely coming from. Based on that, how can we be assured that contamination above and beyond what has already occurred will not continue in the future? I believe the Navy MUST address this issue as part of their EIS as it certainly is a major potential environmental affect of not only current use of the OLF field, but certain a major factor in proposed INCREASED use. As far as potential other affects of proposed increased flights.. When I purchased my property the Prowlers were flying (with a different flight pattern) and I never had a problem with them. The Growlers are considerably louder, not only in decibel, but whole visceral body reaction, than the Prowlers were. EFFECT OF NOISE ON CENTRAL WHIDBEY FARMERS The current farming situation is that we are a very fertile farming region (class 1 and 2 soils, which means GOOD!) with current farming enterprises consisting of some small scale 'commodity crop" farming (such as grain crops) but mostly lots of smaller scale specialty crop production which is highly diversified and functions mostly with lots of hand labor. Why is this important? it means many people are walking around and working on our fields on a daily basis for most of the year in our mild, temperate growing climate. L&I laws in Washington state REQUIRE farm employers to have a noise policy set in place if farm owners are exposing employees to over 85 decibels. This includes purchasing hearing protection, noise monitoring and paying for hearing loss testing. Here is a link to those requirements: <http://www.lni.wa.gov/Safety/Rules/Chapter/.../WAC296-817.pdf...> We know that some of the farms in our area have been routinely showing decibels at well over 85 when Growlers have been flying previously, and with proposed GREATLY increased additional flights, this is of major concern to farmers in the central Whidbey area. I believe it is the liability of the Navy to address this issue. What is the Navy's plan to prevent hearing loss for agricultural employees and to compensate them for irreversible hearing loss. EFFECT OF NOISE ON OUR CENTRAL WHIDBEY ECONOMY My final comments are related to the effect of increased Growler flight operations on the Coupeville community. I want to support adequate training for Navy pilots and I'm thankful for all they and the Navy community does for our nation. However, Coupeville is NOT a Navy town in the sense that Oak Harbor is. Oak Harbor's economy is completely tied to the Navy. Unfortunately, the town and community of North Whidbey has never really worked to develop an economy separate from the Navy. Central Whidbey and Coupeville have benefited economically by the Navy in the sense of we have many active and retired navy folks who have settled here, we have Navy families that live in our area and our businesses do get a certain amount of business from Navy personnel purchases. Coupeville, however, has a much more diversified economy. Ask any business owner in downtown Coupeville

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 12.p. Local Differences in Economy
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

and they will say that you “make or break it” in Coupeville during the summer season. This is MOSTLY due to off island tourist visitors to Whidbey Island. They come to Whidbey Island to experience small town living, to take quiet walks through our forests and prairie preserves, to visit small farm stands, to shop in small town businesses, to experience great locally produced foods crafted by talented chefs and to stay in our many unique and beautiful bed and breakfast and destination type resorts. They come to have their weddings and special events in our beautiful setting. They come “to get away” to a rural, agriculture community. When that vacation time also includes Growler flights so loud they can’t sleep at night during their B&B stays, or is so loud, that when they drive up to a local farm store, they decide to not even get out of their car and just leave, or ruins what was supposed to be a peaceful walk in the woods or prairie or blasts over a wedding event? These tourists, the economic drive behind most of the rest of Whidbey Island, are certainly not happy with their experience and they leave and they certainly don’t want to come back or recommend the experience to others. (And all those noted situations HAVE occurred to local businesses when Growlers have been flying). This is a huge, potential economic loss to not only Central Whidbey, but South Whidbey as well since many tourists come to our island to experience both areas together, particularly the EBEYS LANDING NATIONAL HISTORIC RESERVE area in central Whidbey. EFFECT ON PROPERTY VALUES Greatly increased noise levels, the greatly increased possibility of crashes in the area surrounding the OLF, none of those are compatible with the economy and culture of Central and South Whidbey and certainly not the EBEY’S LANDING NATIONAL HISTORIC RESERVE (ELNHR) which, as a unit of the National Park Service, was created for the express purposes of (from their own website) “preserv(ing) the historical, agricultural and cultural traditions of both native and Euro-American – while offering spectacular opportunities for recreation.” When the Prowlers were flying, the purposes and the goals of the ELNHR were still compatible with those flights. The “sound exposure” simply wasn’t that great, or noticed, to make a difference on our rural community and day-to-day lives and businesses. But with the Growlers, and their greatly increased noise levels and now proposed GREATLY increased flight amounts, those things are compatible at all. In addition...because of the ELNHR, there is a large percentage of land in the central Whidbey area which no longer has developmental rights. The goal was and is, to preserve this land in farming and maintain the scenic, cultural aspects that were included by doing so. Over time, this has had two effects. It has allowed farming to continue in our area because land was valued as farmland, not potential housing. Recently however, as many predicted years ago, the value of the land BECAUSE OF the scenic easements has been increasing exponentially. Simply saying, people are willing to pay more for land in our area simply because THEY ARE GUARANTEED the 10 acre and home they just bought with a great view is surrounded by other lands that can never be developed upon. Because of this, just our farmland has doubled in assessed value. This affect is mostly a benefit to those of us owning land in this area because now our properties are worth more BECAUSE of the nature of our community and definitely the work of the ELNHR to preserve the area. Now however, we are looking at something that has the potential to greatly DECREASE the value of our land. Why would people want to buy that beautiful, peaceful 10-acre home surrounded by preserved farmland when they will be blasted by intolerable noise? That isn’t why people move to our community (including those retired Navy folks many of whom are also very concerned about this noise issue!). Or, for that matter, why would they buy this land that may be at the risk of losing their well water to contamination with



no assurances that the Navy will "make it right" if that does occur? They won't buy it. Or they will, at greatly reduced price. In addition, many who own land without the development rights, will now be faced with the prospect of now the land is truly only valued as farm land which, ironically has become MUCH MORE DIFFICULT TO FARM because of the noise issue for those working in the fields. With all these points.... I hope you can understand my great concern about the proposed Growlers flights at OLF. I would hope the Navy would seriously consider the huge impact this will have on our communities and our lives, and at look to mitigate this situation in any and all ways possible. Spreading the Growlers between many Naval communities would be one answer or finding a place the Growler's can practice that is NOT in a populated NATIONAL HISTORIC RESERVE area. Or find SOME WAY to reduce the noise volume on the Growler's. Thank you for your time! Please accept these comments. Please take them to heart.

COUPEVILLE, WA 98239

I am opposed to the increase in Growler flights in the Central Whidbey area. The noise impact alone is not congruent with the area located in the EBEYS LANDING NATIONAL HISTORIC RESERVE. Why would a country wanting to preserve and protect an area with a NATIONAL HISTORIC designation allow such noise pollution??

1.a. Thank You

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

My name is [REDACTED]. I have lived in Coupeville for 17 years. I am voicing my concerns regarding the intention of the Navy to increase Growler flights in the Central Whidbey Island area. I trust you will take them to heart. PFA Contamination This first point of concern is unresolved in the current EIS. It is my understanding that the current EIS does not address this issue at all. What is the Navy's plan to continue to test and monitor the contaminated wells? If contamination continues to spread, what is the Navy's plan to recompense those home and business owners that are now affected? It is also my understanding that the Navy has not indicated any current plans to discontinue use of the fire suppressing materials from which the PFA contaminants seems to be most likely coming from. Based on that, how can we be assured that contamination above and beyond what has already occurred will not continue in the future? I believe the Navy MUST address this issue as part of their EIS as it certainly is a major potential environmental affect of not only current use of the OLF field, but certain a major factor in proposed INCREASED use. As far as potential other affects of proposed increased flights.. When I purchased my property the Prowlers were flying (with a different flight pattern) and I never had a problem with them. The Growlers are considerably louder, not only in decibel, but whole visceral body reaction, than the Prowlers were. EFFECT OF NOISE ON CENTRAL WHIDBEY FARMERS The current farming situation is that we are a very fertile farming region (class 1 and 2 soils, which means GOOD!) with current farming enterprises consisting of some small scale 'commodity crop" farming (such as grain crops) but mostly lots of smaller scale specialty crop production which is highly diversified and functions mostly with lots of hand labor. Why is this important? it means many people are walking around and working on our fields on a daily basis for most of the year in our mild, temperate growing climate. L&I laws in Washington state REQUIRE farm employers to have a noise policy set in place if farm owners are exposing employees to over 85 decibels. This includes purchasing hearing protection, noise monitoring and paying for hearing loss testing. Here is a link to those requirements: <http://www.lni.wa.gov/Safety/Rules/Chapter/.../WAC296-817.pdf...> We know that some of the farms in our area have been routinely showing decibels at well over 85 when Growlers have been flying previously, and with proposed GREATLY increased additional flights, this is of major concern to farmers in the central Whidbey area. I believe it is the liability of the Navy to address this issue. What is the Navy's plan to prevent hearing loss for agricultural employees and to compensate them for irreversible hearing loss. EFFECT OF NOISE ON OUR CENTRAL WHIDBEY ECONOMY My final comments are related to the effect of increased Growler flight operations on the Coupeville community. I want to support adequate training for Navy pilots and I'm thankful for all they and the Navy community does for our nation. However, Coupeville is NOT a Navy town in the sense that Oak Harbor is. Oak Harbor's economy is completely tied to the Navy. Unfortunately, the town and community of North Whidbey has never really worked to develop an economy separate from the Navy. Central Whidbey and Coupeville have benefited economically by the Navy in the sense of we have many active and retired navy folks who have settled here, we have Navy families that live in our area and our businesses do get a certain amount of business from Navy personnel purchases. Coupeville, however, has a much more diversified economy. Ask any business owner in downtown Coupeville

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.n. Quality of Life
- 12.p. Local Differences in Economy
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

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no assurances that the Navy will "make it right" if that does occur? They won't buy it. Or they will, at greatly reduced price. In addition, many who own land without the development rights, will now be faced with the prospect of now the land is truly only valued as farm land which, ironically has become MUCH MORE DIFFICULT TO FARM because of the noise issue for those working in the fields. With all these points.... I hope you can understand my great concern about the proposed Growlers flights at OLF. I would hope the Navy would seriously consider the huge impact this will have on our communities and our lives, and at look to mitigate this situation in any and all ways possible. Spreading the Growlers between many Naval communities would be one answer or finding a place the Growler's can practice that is NOT in a populated NATIONAL HISTORIC RESERVE area. Or find SOME WAY to reduce the noise volume on the Growler's. Thank you for your time! Please accept these comments. Please take them to heart.

1.a. Thank You

Anacortes, WA 98221

I fully support the Navy's intent to increase the number of Growlers at NAS Whidbey.

Lopez Island, WA 98261

During WW II, I grew up under the flight pattern of the Sand Point Naval station. It was reassuring to know that we were protected and respected. There were no late night flights nor afterburner outbursts. Now I live under the flight pattern of Whidbey Island Naval Station. It is frightening, disorienting and harmful. My visitors are puzzled by the intensity and frequency of the noise, my grandchildren are bothered by it and the articles in my home are jiggled askew by it. I am sure this is not a healthy situation. Please do not bring more Growlers and please search for a possible alternative training ground. Thank you.

1.a. Thank You

2.c. Compliance with the National Environmental Policy Act

4.r. Nonauditory Health Effects

Lacey, WA 98503

My wife, [REDACTED], and I moved to central Whidbey Island in 1977. Our small farm was north of OLF, in the flight path of the old jets. We were frequent callers to the complaint line at the base because of the low flights directly over our farm house at night. We moved from Whidbey in the late 1980's after too many years of putting up with the jet noise from OLF. However, we still own 20 acres of forestland next to our old farm property. We have long planned on building a retirement home on that property but have held off waiting to find out if the Navy would vacate OLF to locate to a less populated practice field. Now we understand that the new jets produce more noise and fly more frequently with added flights under consideration. We want to record our objection to these developments. They mean more negative impact on all aspects of life in the central Whidbey Island area; especially regarding the unbearable noise, residential safety (the dangers of crashes), tourism (we loved having friends and relatives stay with us when we lived on the island, but limited it to weekends because of the risk of noise late into the weekday nights), health of our children (our kids played in our yard, practiced on sports teams in Rhododendron Park and at the High School fields with the noise of those old jets – who knows the impact on their long term hearing), our property values and plans for a peaceful retirement on our land. Regarding the Environmental Impact Statement, we urge a balanced, thorough, science based accounting of these and other negative impacts on our natural and human environments with special emphasis long term exposure to these jet practice flights.

- 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 Townsend, WA 98368

My comments and concerns on the Growler Airfield on Whidby Island: I am worried, not only about how the noise affects my neighborhood and the communities that are even closer to the flight paths but for the impact of the noise on the wildlife that is so important to me. Orca have very sensitive hearing and they and the wildlife in the National Park are critically dependent on a quiet environment. The Draft EIS analysis of the noise from the proposed expanded Growler program does not measure the impact. The analysis uses a 24-hour average as a threshold for 'unacceptable' noise from these aptly named aircraft. Because the noise from the jets is of an intermittent nature, averaging that very loud but brief noise does not accurately reflect the actual impact. Furthermore, the document does not provide an accurate 'no action alternative' by which we can compare potential future impacts (from noise, exhaust, etc) with current conditions. For these reasons, and many more, I strongly request that the draft document be re-written in a way that meets the requirements of NEPA and brought back to the public for review. Sincerely, [REDACTED]

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 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
- 2.l. No Action Alternative
- 4.d. Day-Night Average Sound Level Metric
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Coupeville, WA 98239

I work from a home office. When the Growlers are flying, I am unable to work due to the noise, even with all windows and doors shut. Even wearing a headset with microphone right next to my mouth, people with whom I am conversing on the phone are unable to hear me. With the current flight schedule, that impacts me as much as two hours per day (when the planes are flying). With the full schedule of flights proposed, that would likely impact me for a full 8 hours/day. How did you include the economic impact on home-based businesses and other businesses not directly tied to the Growlers?

- 1.a. Thank You
- 12.f. Economic Hardship and Impacts
- 12.k. Compensation to Citizens for Private Property
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference

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- 4.o. Classroom Learning Interference

Coupeville, WA 98239

I understand that noise modeling and noise averaging are commonly used for measuring impact. Yet, this technology does not seem adequate for this study, and this issue was raised in earlier public forums. My hearing has already been impacted and would continue to be significantly impacted by the noise. Why did the Navy choose not to include actual noise measurements in the Impact Statement?

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

Bainbridge Island, WA 98110

Expansion of Growler flights at the Outlying Field over the past few years has already done significant damage to quality of life for those living in Coupeville and surrounding communities. I would strongly urge that the Navy consider alternatives that would relocate training flights altogether to a less populated area, as opposed to the planned expansion which is certain to degrade the area even further, lower property values, and negatively impact the local economy.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.j. Property Values
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

Bainbridge Island, WA 98110

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

Bainbridge Island, WA 98110

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.

Bainbridge Island, WA 98110

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



Bainbridge Islan, WA 98110

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.

Bainbridge Island, WA 98110

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.

Bainbridge Island, WA 98110

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).

Bainbridge Island, WA 98110

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.

Bainbridge Island, WA 98110

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

Bainbridge Island, WA 98110

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.

Bainbridge Island, WA 98110

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.

Bainbridge Island, WA 98110

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



Bainbridge Island, WA 98110

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

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

Bainbridge Island, WA 98110

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.

Bainbridge Island, WA 98110

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.

Bainbridge Island, WA 98110

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

Accident response and environmental impact discussion From DEIS, page 4-261: "... While it is generally difficult to project future safety/mishap rates for any aircraft, the Growler has a well-documented and established safety record as a reliable aircraft." Ignoring pilot error as a potential cause for a mishap creates an unrealistic view of the potential of a mishap. The DEIS downplays the likelihood of a crash instead of analyzing the potential mishap scenarios, responses and potential environmental impact. The number of flight operations will increase significantly under all options presented, therefore, the likelihood of a mishap is also significantly increased. The DEIS provides no data on accident history or mishap rate of EA-18G or the F-18 Hornet platform. The Navy provided the following information subsequent to the 2003 EIS to convert the A-6 fleet to EA-18G: From: AICUZ Study Update for Naval Air Station Whidbey Island's Ault Field and Outlying Landing Field Coupeville, Washington, Final Submission, May 2005 Table 5-2 Accident History Summary, 1975-Present Aircraft Type Date Accident General Location Type of Flight Operation EA-6 August 1976 NAS Whidbey Island Golf Course IFR departure A-6 September 1976 Water west of Ault Field Runway 07 Instrument operation EA-6B February 1980 Water northwest of Ault Field Runway 13 FCLP (approach) P-3A January 1981 Hard landing on Ault Field runway Landing (touchdown) EA-6B December 1982 OLF Coupeville off government property FCLP (break maneuver) EA-6B October 1985 Landing on Ault Field runway Landing (rollout) A-6 August 1989 Ault Field runway Practice air show flight demonstration A-6 November 1989 Water northwest of Ault Field Approach A-6 January 1990 Ault Field Clear Zone Post-maintenance flight Notes: Instrument Flight Rules (IFR), field carrier landing practice (FCLP) Source: Draft Environmental Impact Statement (DEIS) for proposed air operations associated with increased training activity at Ault Field and OLF Coupeville, August 2003 Growler mishaps reported: Nov. 17, 2008: A Navy EA-18G "Growler" made an emergency landing at Nellis Air Force Base in Nevada after its left engine caught on fire on Nov. 17, Navy officials say. Officials are investigating after a Navy EA-18G Growler was damaged during an attempted landing aboard the carrier John C. Stennis in the South China Sea on May 29, 2016. The DEIS should describe responses to mishaps and likely environmental impact of accident response, impact of use of fire retardant chemicals (eg: The Navy's use of two perfluoroalkyl substances (PFAS); perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) which are one the EPA Health Advisory list)

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

Comments to Draft EIS for EA-18G "Growler" Airfield Operations at NAS-WI complex, November 2016

December 9, 2016

From [REDACTED]

[REDACTED]  
Langley, WA  
[REDACTED]

**1. Social Justice Impact Discussion fails to forecast impact of jet noise on demographics**

Higher, more prolonged noise in APZ areas have and will continue to drive out residents who can afford to relocate. The DEIS makes no assumptions about shifting census demographics occurring due to the lower housing costs in undesirable areas (i.e. high noise) which will, over time, contain more and more lower income residents, thus disproportionately impacting economically disadvantaged populations.

A recent evaluation of the properties affected by noise document a 3.6% reduction in property values -- at the current levels of noise. This amounts to a taking of approximately \$9,000,000.

This \$9,000,000 is computed only for Island county and will grow as more Growlers train and the noise become more pervasive and the reputation of the area for livability is further harmed.

**Why doesn't the Navy consider purchasing the property necessary to conduct safe flight operations with minimal impact to civilian populations?**

**2. Other alternatives not considered as required by the NEPA process:**

" The Navy plans to buy 88 Growlers, which will replace the EA-6B Prowler as the fleet's primary electronic warfare aircraft."

The DEIS makes no mention of an alternative to not use the additional aircraft for deployment. 88 aircraft were originally intended to replace the EA-6. The Navy did not request the additional 36 aircraft and could reasonably be expected to use the additional aircraft as replacements as needed. The aircraft could be stored for future use. This option would likely save the Navy money and eliminate the need for additional flight operations and the resultant environmental impacts completely.

**Why was this option not evaluated?**

1.a. Thank You

12.j. Property Values

12.k. Compensation to Citizens for Private Property

13.a. Environmental Justice Impacts

2.k. Range of Alternatives

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](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

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

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

PLEASE DISCLOSE THE NOISE-SPECTRAL

PROFILE OF THE GROWLER EA 2014

SEE PATRICK KESTER  
WILEY LABS

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.a. General Noise Modeling

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

Langley, WA 98260

- 1.a. Thank You
- 12.i. Housing Access and Affordability
- 13.a. Environmental Justice Impacts

Social and Economic impact analysis fails to consider the predictable outcome of residents moving from undesirable, noisy areas if they can afford to move. Only people with limited means will not have the ability to move from the noisiest areas, therefore, a low-income neighborhood will develop as a result of the Navy's action. This DOES impact low income and disadvantaged persons disproportionately. The history of airports and air installations is easy to analyze for this outcome and the DEIS makes no attempt to predict this very likely outcome. Predicting the reasonably-forecastable outcomes is the objective of the EIS, not simply counting people in the neighborhoods and assuming there will be no change. The NEPA process is designed to PREDICT what is likely to happen when the alternatives are implemented. Being able to reasonably forecast that lower income neighborhoods and communities will develop as a result of the proposed actions is well within the Navy's ability to plan and think ahead. Ignoring this eventuality is disingenuous to the NEPA process and must be addressed in the final EIS.



Comment to Draft EIS- for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex, November 2016

Comments by:

██████████  
Langley, Washington, 98260

**Classroom interruptions and noise exposure to children**

Noise generated in any of the scenarios interrupt classroom instruction (Pages 4-35, 4-120) and expose children to noise levels known to cause health issues if exposure is prolonged.

The DEIS does not recommend any amelioration, - i.e. restriction of flight operation during school hours, avoidance of schools during school sessions, funding addition sound insulation or any other possible actions to reduce the interruptions or noise exposure.

Children play outdoors, take lunch breaks, wait for busses and walk to/from school during school terms and are directly exposed to sound levels in excess of 90 dBA during Flight Operation. Studies suggest that permanent hearing loss is likely for exposure of just a few minutes at these levels<sup>1</sup>.

Noise levels up to 117 dBA were recorded by the National Park Service during flight operations - considerable higher than the 100dBA levels at which permanent hearing damage is likely.<sup>2</sup>

The DEIS in Table 4.2-3 shows two areas, Cox Road and Island Ridge Way and Coupeville Elementary, would have LOWER Max noise exposure, but does not explain how flight patterns would be altered from the No Action Alternative to lower maximum noise. This finding seems inconsistent with the proposal to add aircraft and flight operations.

**What actions does the Navy propose to allow for schools to provide instruction and to protect children from harm when aircraft are in close proximity and likely to cause permanent hearing loss in young children?**

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.f. Economic Hardship and Impacts
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.k. Comparison of the Prowler to the Growler
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.g. Mapping and location of Ebey's Landing National Historical Reserve and Central Whidbey Island Historic District

<sup>1</sup> Children's health and the environment: A review of evidence. Tamburini G et al., eds. EEA-WHO, 2002 ([www.eea.europa.eu/publications/environmental\\_issue\\_report\\_2002\\_29](http://www.eea.europa.eu/publications/environmental_issue_report_2002_29))

<sup>2</sup> Ebey's Landing National Historical Reserve, *Acoustical Monitoring Report*, Natural Resource Report NPS/ELBA/NRR - 2016/1299, pg viii.

Comments to Draft EIS for EA-18G "Growler" Airfield Operations at NAS-WI complex, November 2016

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 ██████████  
 Langley, WA  
 ██████████

**Accident response and environmental impact discussion**

From DEIS, page 4-261: "... While it is generally difficult to project future safety/mishap rates for any aircraft, the Growler has a well-documented and established safety record as a reliable aircraft."

Ignoring pilot error as a potential cause for a mishap creates an unrealistic view of the potential of a mishap. The DEIS downplays the likelihood of a crash instead of analyzing the potential mishap scenarios, responses and potential environmental impact. The number of flight operations will increase significantly under all options presented, therefore, the likelihood of a mishap is also significantly increased.

The DEIS provides no data on accident history or mishap rate of EA-18G or the F-18 Hornet platform.

The Navy provided the following information subsequent to the 2003 EIS to convert the A-6 fleet to EA-18G:

**From: AICUZ Study Update for Naval Air Station Whidbey Island's Ault Field and Outlying Landing Field Coupeville, Washington, Final Submission, May 2005**

**Table 5-2 Accident History Summary, 1975-Present**

Aircraft Type	Date	Accident General Location	Type of Flight Operation
EA-6	August 1976	NAS Whidbey Island Golf Course	IFR departure
A-6	September 1976	Water west of Ault Field Runway 07	Instrument operation
EA-6B	February 1980	Water northwest of Ault Field Runway 13	FCLP (approach)
P-3A	January 1981	Hard landing on Ault Field runway	Landing (touchdown)
EA-6B	December 1982	OLF Coupeville off government property	FCLP (break maneuver)
EA-6B	October 1985	Landing on Ault Field runway	Landing (rollout)
A-6	August 1989	Ault Field runway	Practice air show flight demonstration
A-6	November 1989	Water northwest of Ault Field	Approach
A-6	January 1990	Ault Field Clear Zone	Post-maintenance flight

**Notes:**

Instrument Flight Rules (IFR), field carrier landing practice (FCLP)

**Source:**

Draft Environmental Impact Statement (DEIS) for proposed air operations associated with increased training activity at Ault Field and OLF Coupeville, August 2003

Growler mishaps reported:

Nov. 17, 2008: A Navy EA-18G "Growler" made an emergency landing at Nellis Air Force Base in Nevada after its left engine caught on fire on Nov. 17, Navy officials say.

Officials are investigating after a Navy [EA-18G Growler](#) was damaged during an attempted landing aboard the [carrier John C. Stennis](#) in the South China Sea on May 29, 2016.

**The DEIS should describe responses to mishaps and likely environmental impact of accident response, impact of use of fire retardant chemicals (eg: The Navy's use of two perfluoroalkyl substances (PFAS); perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) which are on the EPA Health Advisory list)**

**Comment to Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex, November 2016**

**Calculating Sound Averages That More Accurately Describe Environmental Impact**

Introduction

Currently accepted practices of using A-weighted noise profiles, NOISEMAP simulation software and annual noise weighting to create sound contours contain assumptions that mask the experience of unwanted noise as reported by many residents of Whidbey Island and the surrounding communities. This situation has created a discrepancy between what the draft EIS purports as reasonable noise metrics and what the local residents report as experiencing. This report outlines shortcomings in the current Growler noise modeling averaging techniques and proposes changes in the DEIS to more accurately reflect the impact of the noise on the community so that a more accurate and realistic impact can be described in the final EIS.

Airport noise has been analyzed as it relates to "annoyance" of the local residents. Day-Night average contours have been used to assess the potential annoyance based a relatively steady level of sound throughout a day and over a year. Averaging the noise over a year has been shown to equate well to annoyance levels when the noise is relatively constant throughout the year. However, the annoyance levels experienced and reported by residents near the Growler flight path seem to exhibit a much higher degree of annoyance than the literature and accepted practices would explain.

The following factors are postulated to explain the discrepancy:

1. The Growler, based on the F/A-18F airframe, is equipped with engines that produce 44,000 pounds of thrust having a significant low-frequency content that is not modeled when using dBA noise metrics. The result is that the noise modeling, capturing only sound in the human-hearing frequency range, does not account for the effects of lower frequencies which are experienced as "felt" rather than "heard."
2. Training occurs in periods of peak intensity in order to support deployment requirements. Squadrons deploy (five jets per squadron currently and seven to eight proposed in the DEIS) within a narrow time window so that the pilots are all carrier-qualified in a narrow time window. This has the effect of lumping flight operations (eg. Field Carrier Landing Practice, FCLP) into a few days with up to 200 flight operations per day, including night operations.
3. Noise contours based on a 365-day averaging work for operations of a fairly continuous nature and are not as useful for a few, very loud events. The intense sound of the Growler, Sound Event Level (SEL) of 118 dBA at 600 Ft<sup>1</sup> is equivalent to a leaf blower or rock concert, both

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<sup>1</sup> "Air Installations Compatible Use Zones Report", Naval Air Station Lemoore, California, November 2010, Page 4-14

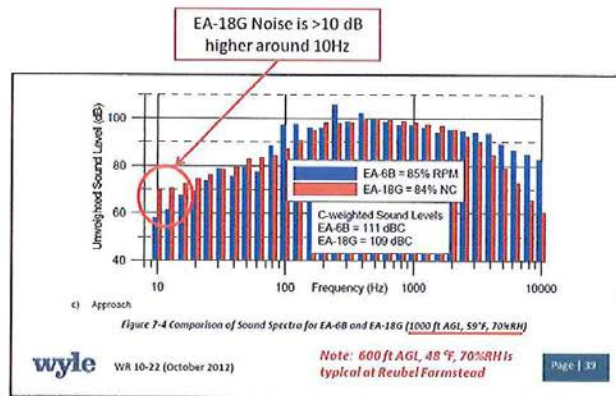
## Calculating Sound Averages That More Accurately Describe Environmental Impact

recommended to have ear protection. Other DoD agencies use daily noise averages routinely to remain below acceptable community noise levels when generating a few loud events per day<sup>2</sup>.

### Discussion

#### Impact of Low Frequency Noise

The Growler noise profile, when compared to the A-6B, Prowler, has significantly higher sound pressure energy at lower frequencies. Figure 1 shows the Growler having 15-20 dB greater levels over the Prowler at 10 - 15 Hz. The power levels used for FCLP in the DEIS are modeled at 85 %NC, similar to the data in the chart.



Source: Final VAQ EA October2012 Appendix C reduced.pdf

Figure 1 Sound Profile of EA-18G compared to EA-6B

This lower frequency component also travels farther, i.e. experiences less atmospheric attenuation, than higher frequencies. However, this effect is not carried forward if dBA weighting is used since dBA weighting filters the frequencies below 1000 Hz. C-weighting includes the lower frequencies and better captures the sound energy of the event. Figure 2 depicts the sound energy that is included (to the right of the curved line) and excluded (to the left of the curved line) in A-weighted metrics. The Growler has a significant amount of sound energy excluded from the modeling using A-weighting metrics.

The result is an understated amount sound energy used to calculate sound contours, which, in turn, results in sound contours encompassing smaller areas in modeling than experienced in practice.

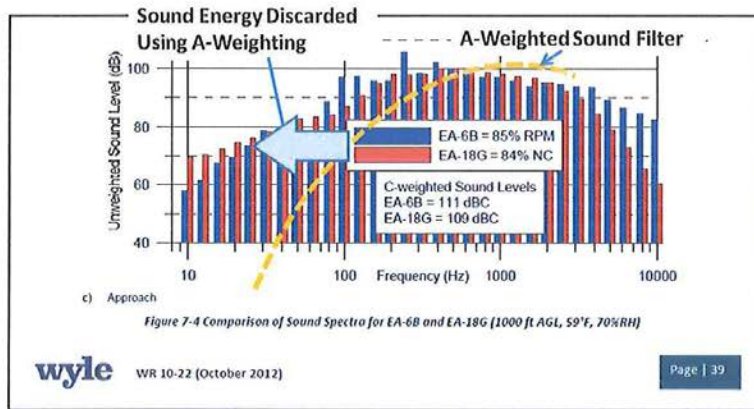
<sup>2</sup> Fort Bliss Mission and Master Plan (TX, NM); Final Programmatic Environmental Impact Statement; Volume II, Appendices A through K, December, 2000, pg G-17.

**Calculating Sound Averages That More Accurately Describe Environmental Impact**

The additional effect of excluding low frequency sound is to understate the distance the sound pressure can be experienced. Lower frequencies travel considerably farther as explained in *Fort Bliss Mission and Master Plan*:<sup>3</sup>

"The atmosphere absorbs sound energy. However, this absorption is not a significant factor for sounds with frequencies of 500 Hz or less. For example, at 10 Hz, approximately 0.04dB is lost to atmospheric absorption over a 6.2-mile distance, and for a sound at 100 Hz, about 3.5 dB is attenuated over the same distance. Conversely, for a sound at 1,000 Hz, approximately 100 dB would be lost over the same 6.2 miles."

In addition, water is a very good reflector of sound waves, resulting in even farther propagation of sound energy to surrounding communities. It is not clear how this modeling is included in NOISEMAP since most airport modeling is typically for airports surrounded by land.



Source: Final VAQ EA October2012 Appendix C reduced.pdf

Figure 2 Discarded Sound Energy Using A-Weighting

<sup>3</sup> *Fort Bliss Mission and Master Plan (TX, NM); Final Programmatic Environmental Impact Statement; Volume II, Appendices A through K, December, 2000, pg G-18*

## Calculating Sound Averages That More Accurately Describe Environmental Impact

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### Operational Training Peaks

From the Draft EIS:

" Per Navy guidelines, pilots must perform FCLP before initial carrier qualification (ship) lands or re-qualification landings. The first carrier landing needs to occur with 10 days of completion of FCLP."

Growler Squadrons currently have five Growlers each and the DEIS proposes adding either two or three Growlers to each VAQ squadron; meaning a squadron would then deploy with seven or eight planes. A pilot typically requires, on average, 150 "bounces" (a simulated carrier landing) to become proficient at one of the most challenging tasks in aviation. For a squadron of 8 planes, this totals 1200 bounces and is counted as 2400 Flight Operations in the DEIS. The DEIS further explains that a typical FCLP lasts 45 minutes with three to five aircraft participating the training.

Using an average of four planes per exercise, 45 minutes would permit 8-10 FCLP loops per session, or a total of 32 to 40 FCLP landings and takeoffs. If there are few minutes between sessions, one could assume a session occupies an hour, therefore, the number of sessions required to train a squadron equals the number of hours of FCLP required. This totals about 24 hours for a 5-jet squadron and 37.5 hours for an 8-jet squadron. At three training sessions per day, each day has 96 bounces.

The training scenario outlined above would occur for 8-10 days over a two-week period to prepare all pilots in a five-jet squadron for deployment. Alternative1A in the DEIS would generate 183 days of training using the scenario described above, approximately two weeks of training followed by two weeks of no activity, on average, in order to accommodate the larger squadrons, weather permitting.



## Calculating Sound Averages That More Accurately Describe Environmental Impact

### Typical Training Day Noise Averaging

Using SEL data for F/A-18E/F, the same platform as the Growler, the value for a daily noise level average can be calculated. Table 4-4 from the AICUZ for NAS Lemoore is partially reproduced below in Table 1.<sup>4</sup>

Condition	F/A-18C/D				F/A-18E/F			
	Power %NC	Speed (knots)	SEL (dBA)	Lmax (dBA)	Power %NC	Speed (knots)	SEL (dBA)	Lmax (dBA)
Departure through 1,000 ft AGL (not co-located)	97	300	114	108	97	250	116	113
Departure through 10,000 ft MSL (prior to Hwy 41)	97	310	91	77	97	350	91	83
Non-Break Arrival through 1,800 ft MSL (near Initial Points)	88	135	103	95	85	135	110	103
FCLP on Downwind (600 ft AGL)	88	135	114	108	85	135	118	113
GCA Box mid-downwind (1,800 ft MSL)	83	200	91	84	83	200	102	93

Table 1 - Excerpt from AICUZ, NAS Lemoore, 2010

Note: SEL of 118 dBA correlates well with the Nation Park Service calculation of SEL at 117.2 dBA at Reuble Farmstead during an overflight at EBLA001 during the measurement period<sup>5</sup>.

The calculation for daily average of multiple events spread over a day is given by<sup>6</sup>

$$L_{Cdn} = CSEL + \{ 10\text{Log}_{10} (N_D + 10 N_N) \} - 49.4 \quad \text{Equation 1}$$

Where:

CSEL = C-weighted Sound Exposure Level for a single event

$N_D$  = Number of events per 24-hour period occurring between 7:00 a.m. and 10:00 p.m. (daytime)

$N_N$  = Number of events per 24-hour period occurring between 10:01 p.m. and 6:59 a.m. (nighttime)

Multiplying the events by 10 assigns a 10 dB penalty for noise events at night.

49.4 = 10  $\text{Log}_{10}$  of 86,400 (the number of seconds in a 24-hour period).

Source: U.S. Army, 1986b

Using the A-weighted SEL from Table 1, the daily average for a training day can be calculated using Equation 1 with various scenarios spread between day and night FCLP loops.

<sup>4</sup> Air Installations Compatible Use Zones Report, Naval Air Station Lemoore, California, November 2010, Page 4-14

<sup>5</sup> Ebey's Landing National Historical Reserve, Acoustical Monitoring Report, Natural Resource Report NPS/ELBA/NRR—2016/1299, pg viii

<sup>6</sup> Fort Bliss Mission and Master Plan, pg 18

### Calculating Sound Averages That More Accurately Describe Environmental Impact

SEL (dBA)	N <sub>D</sub>	N <sub>N</sub>	Total FCLP Loops	L <sub>cdn</sub> (dBA)
118	96	0	96	88.5
118	80	16	96	92.4
118	60	36	96	94.9

Table 2 Daily Average Noise Level for Typical Training Day

Table 2 Daily Average Noise Level for Typical Training Day shows that for points below the flight path for a Growler at 600 feet, a typical altitude for an FLPC training loop, the daily average for a typical training day is between 88 dBA and 95 dBA.

As discussed above, using A-weighted sound levels understates the amount of energy of Sound Exposure Level since the A-weighting excludes a significant amount of sound energy. Therefore the amount of sound energy experienced by structures (including biological bodies) is even higher.

Using the Reubel Farmstead as a benchmark, it is in the 75dBA noise contour in the DEIS in all alternatives, however, the daily experienced sound average on training days is over 90dBA using calculations for daily averaging. The World Health Organization, the EPA and the DoD all recommend sound protection at levels of 80 dBA. At over 90 dBA the daily average at Reuble Farmstead is **ten times** the level recommended for sound protection.



## Calculating Sound Averages That More Accurately Describe Environmental Impact

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### Conclusion

Residents near the flight paths report significantly higher annoyance levels than predictions by standard annual noise modeling indicate. This report demonstrates that the sound exposure levels of the Growler are significantly higher than the DEIS reports using annual averaging.

C-Weighted noise contours would be more useful for non-human impacts. The EA-18G has considerable amount of sound energy at low frequencies and excluding low frequency sound pressure energy may understate the impact on animals, birds, marine life, and physical structures and should be examined for impact in the final EIS.

Using DoD-sourced information and calculations, the daily sound averages are significantly higher to the point that sound protection is essential to prevent permanent hearing loss for any residents, visitors or workers under or near the flight path when FCLP operations are underway.

### Recommendations to incorporate in the Final EIS

1. C-Weighted Typical Training Day noise averages should be generated in the Final EIS to better inform county and city officials, schools, businesses and the public of the requirements for sound protection to prevent adverse health impacts. The public and public health officials would then be better able to prepare for the impacts to minimize long term exposure effects.
2. Residential populations, businesses, schools and public buildings within Daily Typical Training Day noise contours over 80 dBC should be specifically notified so that appropriate precautions can be taken.
3. Residential populations within the 80 dBC and higher Daily Typical Training Day contours should be monitored for adverse health effects since long term exposure could produce chronic conditions.

Submitted by:

██████████  
██████████y  
Langley, WA 98260

████████████████████  
February 17, 2017

Comments to Draft EIS for EA-18G "Growler" Airfield Operations at NAS-WI complex, November 2016

Historical structures will suffer direct significant impacts and the DEIS contains no proposed actions to avoid, minimize or mitigate appropriately as required by National Historical Preservation Act.

NPS staff will be significantly impacted in the normal performance of their duties due to the noise levels experienced in the NPS office at Reuble Farms within Ebey's Landing National Historical Reserve.

██████████  
 ██████████  
 Langley, WA  
 ██████████

Reference From DEIS -

**3.6.1.1 Section 106 of the National Historic Preservation Act**

Page 3-78:

" If a cultural resource can be demonstrated to meet the criteria for listing on the NRHP and retains its integrity (i.e., location, design, setting, materials, workmanship, feeling, and association), it qualifies as a historic property, and adverse effects, either direct or indirect, to that historic property must be avoided, minimized, or mitigated appropriately. Direct effects physically alter the historic property in some way; indirect effects diminish some significant aspect of the historic property but do not physically alter it."

**Summary**

The Draft EIS makes no attempt to analyze the impact on historical structures located directly under the flight path of the EA-18G while performing FCLP.

Structures in Ebey's Landing National Historical Reserve,a National Park Service property, will suffer adverse effects under the definition of Section 106 or significant impacts under the definition of NEPA.

These properties will suffer direct effects: Damage potential to historical building due to low-flying Growlers generating vibrations, resonances which over time weaken structures and cause increased cracking and loosen joints to make the structures more vulnerable to other deterioration causes (wind, rain).

The Draft EIS fails to consider the following important factors:

- Reuble Farmstead at Ebey's Landing National Historical Reserve is directly under the FCLP flight path of OLF Coupeville.
- EA-18G fly directly over Reuble Farmstead at 600 feet for FCLP and will do so repeatedly during each FCLP session.

- Evaluating potential structural damage using A-weighted sound pressure metrics discards significant amounts of low frequency sound pressure energy emanating from the Growlers
- Low frequency sound pressure has been shown to be particularly damaging to historical structures<sup>1</sup>.
- NPS staff will find increased difficulty conducting normal business and interacting with visitors.
- APZ restrictions could preclude groups of visitors from touring National Park Service's Reuble Farmstead within Ebey's Landing National Historical Reserve

### **Ebey's Landing Historical Reserve**

Ebey's Landing National Historical Reserve was created by an act of Congress in 1978 to "preserve and protect a rural community, which provides an unbroken historical record from 19th century exploration and settlement in Puget Sound to the present time."

Ebey's Reserve is America's first National Historical Reserve, and the only unit of the National Park Service Managed by a Trust Board representing local, state and federal partners.

More than 85% of the Reserve's 17,572 acres are privately owned. The reserve contains more than 450 heritage buildings, working farms, historic military forts, two state parks, miles of shoreline and the second oldest town in Washington, Coupeville. . Many families have been farming the same land since the 1800's.

The intent of creating the Reserve, as quoted in the act, is to "preserve and protect a rural community.." presumably from destruction or significant modification of the environment, structures and ambiance of the entire 17,000 acres. Private land owners have voluntarily recorded easements to prohibit development and other land uses that would alter the nature of the Reserve. The National Park Service has recommended including OLF into the Reserve as it is a significant portion of Smith Prairie to aid in preservation of the nature of the Reserve.<sup>2</sup>

As shown in Figure 1: Boundary of Ebey's Landing National Historical Reserve, the Reserve abuts OLF Coupeville, and the crash zone for runway 32 extends off the north end of OLF into the Reserve. All of APZ1 and most of APZ2 suggested in the Draft EIS for runway 32 would be within the Reserve boundaries and include all historical structures at Reuble Farmstead.

The Reuble Farmstead also serves as the primary offices for the NPS staff who are required to perform NPS duties during regular business hours regardless of the noise or other interruptions that will result from the FCLP activities outlined in the DEIS. These historical structures cannot, by law, be modified to improve noise insulation, therefore the indoor noise levels are essentially the same as the noise levels experienced outdoors by the NPS staff and visitors.

<sup>1</sup> Carl E. Hanson, Kenneth W. King\*, Mary Ellen Eagan and Richard D. Horonjeff, *AIRCRAFT NOISE EFFECTS ON CULTURAL RESOURCES: REVIEW OF TECHNICAL LITERATURE*, NPOA Report No. 91-3, September 1991, HMMH Report No. 290940.04-1; pg 25

<sup>2</sup> Ebey's Landing National Historical Reserve, Final General Management Plan and Environmental Impact Statement, National Park Service, U.S. Department of the Interior, NPS-WA-060407-F, September, 2006



Figure 1: Boundary of Ebey's Landing National Historical Reserve

Reuble Farmstead consists of several historical structures including the Reuble Barn, the Gillespie House, the granary, and the old barn. These facilities house the NSP staff and host visitors, tour groups, school children and others interested in the history of the local area.

The buildings at Reuble Farmstead are designated historical structures and are protected from damage under section 106 of the National Historical Preservation Act. However, flight tracks in the Draft EIS (see Figure 2) are directly over Reuble farmstead for FCLP training using runway 32.

FCLP pattern altitude is nominally 600 ft AGL meaning that historical structures at Reuble Farmstead will be 600 ft from the aircraft flying directly overhead. A typical training day will mean approximately 100 FCLP loops generating 100 noise events per day for these structures and their occupants, NPS staff and park visitors.

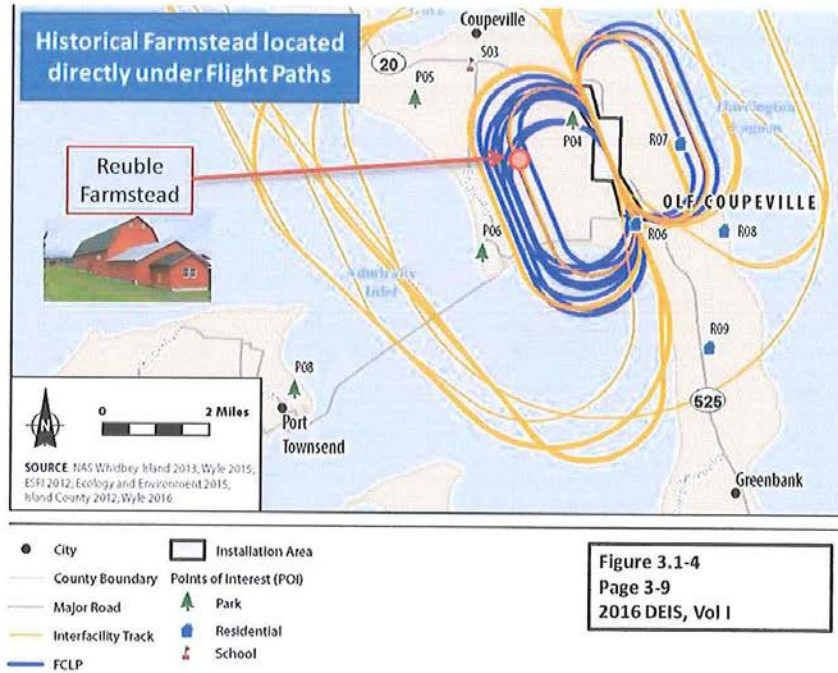


Figure 3.1-4  
Page 3-9  
2016 DEIS, Vol I

Figure 2: Flight tracks over Reuble Farmstead

**Jet Noise Impact on Ebey's Landing NHR Historical Buildings**

Using SEL data for F/A-18E/F, the platform for the Growler, the Sound Exposure Level at 600 ft. is 118dBA See Table 4-4 from the AICUZ for NAS Lemoore which is partially reproduced below in Table 1.<sup>3</sup>

Note: SEL of 118 dBA correlates well with the Nation Park Service calculation of SEL at 117.2 dBA at Reuble Farmstead during an overflight at EBLA001 as recorded during noise measurements<sup>4</sup>.

From DEIS a "high tempo" (i.e. training) day would have 100 flyovers with SEL of 118dBA.

<sup>3</sup> Air Installations Compatible Use Zones Report, Naval Air Station Lemoore, California, November 2010, Page 4-14

<sup>4</sup> Ebey's Landing National Historical Reserve, Acoustical Monitoring Report, Natural Resource Report NPS/ELBA/NRR—2016/1299, pg viii

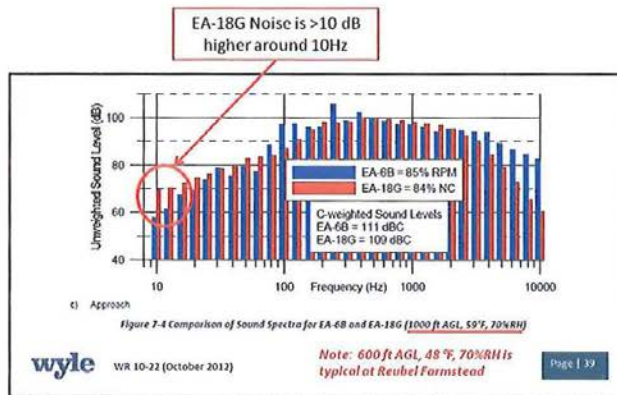
Condition	F/A-18C/D				F/A-18E/F			
	Power %NC	Speed (knots)	SEL (dBA)	Lmax (dBA)	Power %NC	Speed (knots)	SEL (dBA)	Lmax (dBA)
Departure through 1,000 ft AGL (not co-located)	97	300	114	108	97	250	116	113
Departure through 10,000 ft MSL (prior to Hwy 41)	97	310	91	77	97	350	91	83
Non-Break Arrival through 1,800 ft MSL (near Initial Points)	88	135	103	95	85	135	110	103
<b>FCLP on Downwind (600 ft AGL)</b>	88	135	114	108	<b>85</b>	135	<b>118</b>	<b>113</b>
GCA Box mid-downwind (1,800 ft MSL)	83	200	91	84	83	200	102	93

Table 1 - Excerpt from AICUZ, NAS Lemoore, 2010

**Low Frequency Sound Pressure Excluded from Noise Contours**

While human ears cannot detect sound frequencies much below 100 Hz, buildings and structures are subjected to sound pressure at low frequencies which are *excluded* when A-weighted sound measurements are used. The Draft EIS is deficient in failing to include the impact of the low frequencies which are present in the Growler noise profile.

Wiley Labs' data shows Sound Pressure Levels of Growlers to be much higher at low frequencies than Prowlers as shown in Figure 3 - Frequency Profiles of EA-6B and EA-18G.



Source: Final VAQ EA October2012 Appendix C reduced.pdf

Figure 3 - Frequency Profiles of EA-6B and EA-18G

The National Park Service recorded several instances of SPL well over 100 dBA during their monitoring period leading to the reasonable assumption that instances of 118dBA are not unusual. See Figure 4 - NPS Measurements during overflights

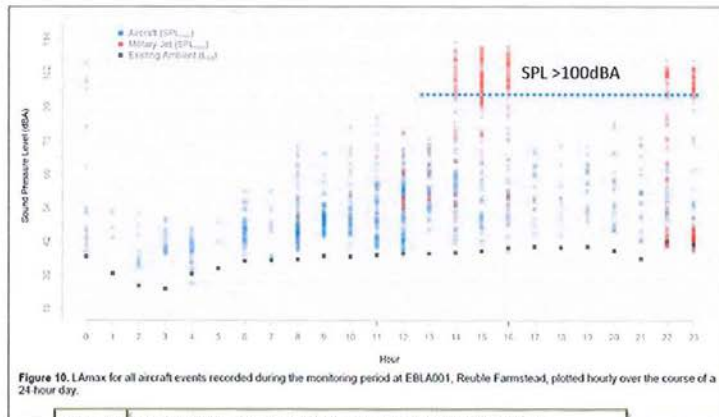


Figure 10. L<sub>max</sub> for all aircraft events recorded during the monitoring period at EBLA001, Reuble Farmstead, plotted hourly over the course of a 24 hour day.

Source: [Figure 10 on Page 15 of National Park Service Report: Ebey's Landing National Historical Reserve Acoustical Monitoring Report Natural Resource Report NPS/ELBA/NRR – 2016/1299](#)

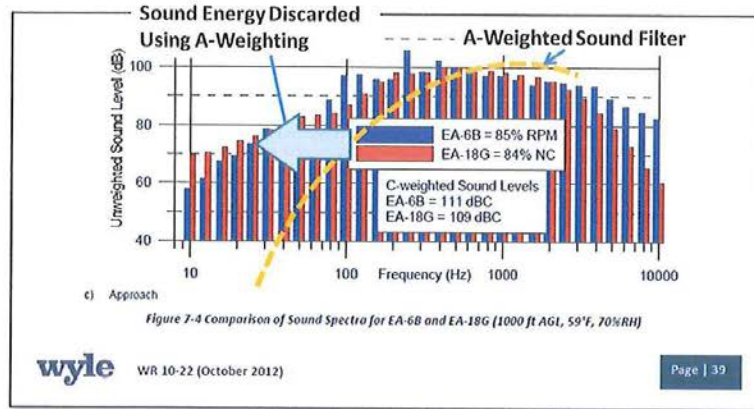
**Figure 4 - NPS Measurements during overflights<sup>5</sup>**

Increased low freq intensity of Growler may have an even greater impact on historic structure and the Draft EIS ignores the sound energy at lower frequencies which will have an impact on structures. See Figure 5 - Sound Energy Discarded by Using A-Weighted Metrics.

Graphically, it would seem that over 20% of the sound pressure energy is excluded, thereby significantly understating the potential impacts to historical structures.

<sup>5</sup> Ibid, Pg. 15





Source: Final VAQ EA October2012 Appendix C reduced.pdf

Figure 5 - Sound Energy Discarded by Using A-Weighted Metrics

#### High Probability of Significant Impact to Historical Structures

Hanson et al reports that frequencies below 40Hz create potential resonances with wood-framed walls and that wood frame and plaster can become damaged at frequencies below 2.7 Hz with displacement greater than 0.03 inches<sup>6</sup>. Hanson also lists probabilities of damaging certain types of structures based on frequency content of the sound pressure and velocity induced by resonance of the structure.

Hanson cites Sutherland and reports the probability of damage to a structure based on a single exposure to a sonic event.<sup>7</sup> Using a "subsonic Jet" as a noise source - the report estimates that the probability of damage to a Wood Frame building with wood panels - (as are on the Reuble Farmstead) is 0.2% if the structure is within 1.56 miles of a nominal military training route.

The Reuble Farmstead buildings are only 600 ft from the aircraft (not 1.56 miles) and are subjected to the noise pressure 100 times during single training day.

Even using the 0.2% probability cited for a distance that is over 13 times farther away than the buildings on Reuble farmstead, the probability of damage for a single day is 20%. If only half of the FCLP flights use runway 32, the probability of damage is 1700% in one year.

<sup>6</sup> Hanson; pg 22, Table 2.3

<sup>7</sup> Ibid., pg 42



**Summary**

This report shows that using A-weighted noise analysis is not appropriate for structure and the low frequency content of the Growlers significantly adds to the potential for damage. Noise contours and analysis for historical buildings is incomplete in the DEIS.

Using data published by the US government, this comment to the DEIS concludes that the buildings in Ebey's Landing National Historical Reserve will almost certainly suffer irreparable and permanent damage from the proposed actions of the DEIS. Indeed, the probability of damage can be estimated to be 1700% in a single year.

The DEIS makes no attempt to analyze this issue, offers no mitigation or alternative actions as required by law to avoid damage to historical properties.

**What is the Navy proposing to minimize the potential of damage to these non-replaceable historical structures?**

NPS Staff and park guests and visitors will be subjected to SEL of over 100 dB on a regular and on-going basis.

Given that historical structures cannot be modified to improve sound insulation, while FCLP training is being conducted at OLF

- NPS staff will be unable to accomplish normal duties
- Visitors will need to be provided ear protection or removed from the area
- Buildings where the staff and visitors are housed could be damaged to the point of structural failure endangering staff and visitors.

**What is the Navy proposing to minimize the risk of harm to NPS staff and visitors?**

**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)

*Concerned Citizen*

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

*Langley WA 98260*

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

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

### Comments

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

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

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

(over)

- 1.a. Thank You
- 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](http://www.facebook.com/whidbeyeis)**

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

Port Townsend, WA 98368

1.a. Thank You  
7.b. Land Use Compatibility and Air Installations Compatible Use  
Zones

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Port Townsend, WA 98368

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Port Townsend, WA 98368

Dear Sir/Madam, The Navy's application for a permit to use the Olympic National Forest for an Electronic Warfare Range must be delayed until unbiased, solid scientific data can support your claim that the Range will have "No Significant Impact" At this point, it is certain that many animals in the forest will suffer, but without scientific studies it cannot be foreseen how badly Growler jets will damage this unique fauna community. Flora in this same community could also be damaged. We already know that humans are significantly harmed by the severity of Growler jet noise. I note the devastation sonar has wreaked on both East and West coast cetaceans as a clear example of unforeseen consequences that can and do occur to the natural environment when the Navy says there is no problem and is allowed to proceed without proper scientific investigation. NOISE: No sound studies have been done of actual noise levels of multiple Growler jets practicing daily above endangered species habitat. The stress of such extreme levels poses significant risks. Research must be conducted before any permitting is considered, as does the adverse effect of such noise levels on humans. If you had loud jet sounds over your home incessantly, how would you react? ECONOMICS: Socio-economic repercussions of the Navy's plans on local communities have not been analyzed. The proposal to fly Growler Jets directly over Olympic National Park and Olympic National Forest poses significant impacts to the region's predominant tourist attraction. A quiet atmosphere is central to "the wilderness experience" that is desired by the majority of visitors to this region. Visitation to Olympic National Park grew more than 10% last year, flushing the local economies with millions of tourist dollars. Managers of Olympic National Forest need to recognize that the economic stability of the small communities on the Peninsula has shifted from timber harvesting and forest products to outdoor recreation and tourism. INCREASED FIRE RISK: With drought conditions increasing in our area, the risk of fires is a considerable one. Growlers fuel tanks carry thousands of gallons of highly toxic fuel. The probabilities and the consequences of these inevitable events should be rigorously and scientifically evaluated before any permit is granted to the Navy for Electronic Warfare Training Range. RADIATION: Subjecting sensitive species such as butterflies, bees, amphibians, birds and other species to this powerful and potentially harmful technology and extreme jet noise without adequate scientific studies is unacceptable. The public wants to see current, comprehensive, peer-reviewed scientific data. For all of the above reasons, I strongly request an extension of the deadline for comments on your EIS. This is a busy holiday time when most people are involved in many related activities. To open and close your process during this time of year is an insult to the people of this country and to an open and fair review process. Sincerely,

- 1.a. Thank You
- 12.h. Tourism
- 17.a. Hazardous Materials and Waste Impacts
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 4.f. Noise Measurements/Modeling/On-Site Validation

Seattle, WA 98177

I fully agree with the following position: "COER's Position on the Navy's Draft Environmental Impact Statement (DEIS) The Navy's DEIS ignores the harmful consequences of Growler operations taking place. It does not address the true environmental and public health consequences of planned Growler increases. The DEIS is flawed by design and prepared in violation of the National Environmental Policy Act. The Navy should relocate touch-and-go Growler training from Whidbey Island to another less populated and environmentally sensitive location. On COER's position concerning the DEIS: we are reviewing the DEIS and will prepare detailed comments to the Navy. This is not being done to legitimize the Navy's actions, but rather to set the stage for a legal challenge to the adequacy of DEIS. The following are a few observations: The DEIS misrepresents the impacts of Growler noise. No measurements of noise were taken in communities. Instead, the Navy used computer modeling that averaged periods of noise with long period of silence. The DEIS ignores overwhelming scientific and medical evidence of harms caused by hazardous Growler noise. It presents no evidence that those harms are not now occurring and will not occur in the future ALL of the alternatives for Growler operations proposed by the Navy will create more noise and harms in communities throughout the Puget Sound. The DEIS's alternatives only shift the burden of harms between communities."

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

Langley, WA 98260

As a long time resident of Whidbey Island, I have always found the Navy to be a good and responsible neighbor. That favorable impression has been undermined by recent events, where the Navy's cavalier attitude to protecting the community's rural character and quality of life. Until the Navy is willing to heed the real and reasonable concerns of its neighbors, it cannot expect our continued support. My own worries are very clearly articulated in the West Coast Action Alliance's list of concerns, which I fully support and include below. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable."

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets

- 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



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, [REDACTED]

Coupeville, WA 98239

I would like the EIS to further address the possible impact of increased jet flights on Ebey's Landing National Historic Reserve. Thousands of people from all over the country come to enjoy the Reserve, the peace and beauty it offers. How will constant jet flights affect their experience? Will people be able to use the Reserve for the purpose it is intended for? Will they be able to learn the local history and experience the landscape? The Reserve is an extraordinary unique place and one of coordinated effort. It should be protected as it is, and not be part of a training ground for jets. Keep this jewel of the North West as it is. Thank you- [REDACTED]

1.a. Thank You

7.g. Ebey's Landing National Historical Reserve

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

The draft EIS does not have a firm designation of the APZ zone for Central Whidbey.  
Thank you- [REDACTED]



Coupeville, WA 98239

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
12.e. Agriculture Analysis

I am very concerned about the affect an increase of jet flight training would have on our agriculture in Central Whidbey. The soil here is among the best on the Island. Farmers can not spend the many hours they need tooutside due to the noise and health problems related to it.The chemicals in the water due to the firefighting foam are harming the irrigation water. Agriculture is a base of our economy and if farmers have to leave it would be devastating. Thank you- [REDACTED]

Coupeville, WA 98239

I live and work on Ebey's Landing Historic Reserve. I am very concerned about the possibility of almost constant jet training flights. I am concerned the visitor experience would be ruined and people would not be able to use the Reserve for what it is intended for. Experiencing the landscape and learning the history would be very difficult and constant noise is not compatible with the Reserve. Thank you - [REDACTED]

1.a. Thank You

8.c. Noise and Vibration Impacts to Cultural Resources

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

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

DATE TAKEN: Friday, December 9, 2016

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

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

REPORTED BY: Mary Mejlaender, CCR No. 2056  
Likkell & Associates  
Court Reporters & Legal Video  
2722 Colby Avenue  
Suite 706  
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- 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
- 2.k. Range of Alternatives

19 (The personal identifiable information disclosure  
20 statement was read to the following commenter.)

21 MS. [REDACTED]: That was -- the -- what  
22 do you call it -- disclosure was read to me.

23 [REDACTED].

24 The EIS needs to address more fully issues such  
25 as the effect on tourism, Ebey's Landing Historical Reserve,

1 agriculture, local businesses, harm to wildlife and increase  
2 in pollution.

3 As a professional caregiver I have been put in  
4 dangerous situations with clients when the jets are flying  
5 and we cannot hear each other. This EIS -- no. Scratch  
6 that. That's fine. That's all I wanted to say.

7 \* \* \*

8 (Further statement by [REDACTED].)

9 MS. [REDACTED]: This EIS does not include  
10 a model for no flights and should include one.

11 (The Public Meeting concluded at 7:00 p.m.)

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

Coupeville, WA 98239

I believe the DEIS does not adequately speak to options of alternative sites for the jets. I had conversations with a pilot trainer at the recent Open House in Coupeville. He mentioned gas expenses, importance of training in water areas, and being near to NAS in case of mechanical trouble. I understand these preferences. Yet, overall, I think NAS and the OLF are very poor choices as places to increase training in the possible amounts stated by the Navy. Whidbey Island has become an inappropriate location due to increased population. Less populated sites in Central Wash. or Northern California should be given real consideration. Thank you- [REDACTED] Coupeville, Wa.

Coupeville, WA 98239

1.a. Thank You

12.h. Tourism

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

I would like the EIS to address more fully the possible economic impacts of increasing the Growler training here at NAS Whidbey. As someone who relates to tourists in a job situation I have a perception of what motivates visitors I come here. They are looking for a peaceful experience, a change from the hustle and noise from which they came. Many come for overnight stays, meals and time in nature. Visitors are already shunning Deception State Park due to the noise of the jets. I feel constant jet noise will contribute to a sharp decrease in tourism and affect the Island County economy very negatively. Thank you- [REDACTED]

Maple Falls, WA 98266

February 22, 2017 EA-18G EIS Project Manager Naval Facilities Engineering Command Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 RE: Draft Environmental Impact Statement (“DEIS”) for Whidbey Island Growler Airfield Operations

Dear Sir or Madam: Thank you for extending until February 24, 2017 the Comment Period for submitting Comments on the DEIS for the Whidbey Island Growler Airfield Operations. I am a birder and frequently observe Marbled Murrelets in Rosario Straits, of Puget Sound. I am submitting comments regarding the potential impact of the Whidbey Island Growler Airfield Operations described in the DEIS, including the impact of increasing the size of the Growler fleet based at Whidbey Island Airfield, on the Marbled Murrelets and their habitat on the Olympic Peninsula. These comments are submitted to be part of the public record regarding the DEIS, and I request that my comments be taken into consideration prior to issuance of the Final EIS. First, I have concerns with the US Dept. of the Interior, Fish and Wildlife Service’s Biological Opinion (the “Bio Op”) which is part of the documentation of the DEIS. There are several areas in the Bio Op where inappropriate assumptions are made, with the consequence that conclusions are reached with little or no foundation, and may well be incorrect. By way of example, with gratitude to other commentators on this DEIS: a) at page 207 of Bio Op, the Service states: “There is no direct research on marbled murrelets that indicates that exposure to very loud sounds will cause a marbled murrelet to flush from a nest. The 92 dBA SEL threshold is derived from research on other bird species.” Given the limitations stated above, the Service needs to conduct studies to determine the sound exposure which will cause marbled murrelets to have an adverse reaction; merely using a number derived from research on other bird species is insufficient for addressing the issues of an Endangered Species. The Services also needs to conduct studies and revise the Bio Op with real noise level data obtained from actual on ground measurements under the actual, specifically located flight paths and heights that the Growlers will travel, wherever they travel, and at whatever power levels they travel, including all times when their afterburners are operating. These studies must also be done by time of day and by time of year. This latter consideration is particularly important in relation to nesting seasons for endangered birds. It is not sufficient to assume that training will take place at a constant number and duration of flights throughout the year, unless in fact it does. b) at page 214 of the Bio Op, the Service ‘assumes that training flights will be evenly distributed throughout the Olympic MOAs’ and that the training flights will be ‘evenly distributed throughout the year’. That is not useful when looking at nesting habitat, as it could be that training flights have a significant cluster of fights during nesting season. Therefor, the Navy needs to provide specific information on training flights to the Service and the Bio Op should incorporate that information. c) at page 216 of the Bio Op, the Service references a study of responses of birds to helicopters and airplanes, but not to supersonic jet fighter planes. Although there does not appear to be a peer-reviewed study of impact of supersonic jet fighter planes on marbled murrelets, the choice of type of planes to review for theoretical impacts is critical as certainly supersonic jet fighter planes, with much larger engines than helicopters and smaller non supersonic jet fighter planes, will have a significantly measurable difference in noise impacts and likely cause significant adverse impacts to birds. This assumption should be revised, and the

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.m. Supplemental Metrics



conclusions of the Bio Op should follow that correction. d) at page 232 of the Bio Op, the Service makes assumptions about flight information, and admits that it does not know flight information, which would include: i) frequency of flights, ii) number of planes, iii) transit flight paths from Whidbey Island to the testing areas over both the Pacific Ocean and the Olympic Peninsula (as those flight paths could well pass over nesting habitat of the Marbled Murrelets). Large portions of those areas between NASWI and the EWR overlies Olympic National Park, a World Heritage Site and an International Biosphere Reserve. Table 3.1-2 of the Draft EIS noted that ground level sound levels for aircraft transiting to and from NASWI can reach 116 dba, and that aircraft in transit can operate as low as 200 feet above ground level. In addition, the mobile emitter sites which the electronic warfare aircraft will be targeting are generally in the higher elevation areas of the Military Operating Areas, and are mostly located in the critical habitat of the marbled murrelet. To proceed without the knowledge of flight profiles of each training flight in these circumstances precludes the Navy and the Service from determining the real environmental impacts of the proposed action; and iv) altitude of the planes (as the flights could be at different altitudes during different aspects of training, such as in-flight training for flying over mountainous terrain or for flying low elevation contours such as would be encountered during actual warfare); v) speed and power levels of flights particularly when flying over the Olympic Peninsula and nesting habitat of the Marbled Murrelets; The Bio Op should be revised to include this information. e) at page 273 of the Bio Op, the Service assumes no impact from distant flyovers of supersonic jet flights over nesting areas that are 'likely to be exposed' but that distant flyovers will not likely to disturb nesting (though more alert and vigilant behaviors may be observed) or fitness consequences occur (last sentence in 2nd paragraph on page). Given what is at risk, (as discussed later in this Comment) that the State of Washington is in the process of up-listing the status of the Marbled Murrelet to 'Endangered', the Service inappropriately reached that conclusion when there is no information as to specifics of flights over habitat and there was no acknowledgement in the Bio Op that there will be flights during transit from Base to Training areas which fly low over landscape as part of training. The Bio Op should be revised to incorporate this information. f) the Service does not address in the Bio Op the locations of the electronic emitter sites which will be used by the Whidbey Island Growlers, but that information would be critical for obtaining a better understanding of the impacts of flyovers by the Growlers on marbled murrelet nesting habit. It appears that Figure 3.2-6 of the EWR EA shows that emitter sites 1 through 8, 12 through 15, will all be located in marbled murrelet critical habitat, and should be reviewed by the Service for incorporation into the Bio Op. g) at page 269 of the Bio Op, the Incidental Take analysis merely focuses on impacts of training over marine zones, inland waters and offshore waters, and does not even address the incidental take which might occur as a result of supersonic jet planes flying over nesting habitat and causing sufficient stress which could result in reproductive failures as well as physical harm to the birds due to hearing loss. The Bio Op should be revised to take into consideration these impacts as part of the Incidental Take analysis. Several additional aspects of missing information in the DEIS will have consequences for the assumptions made by the Service in the Bio Op, and a list of those aspects follows, with gratitude to other commentators on this DEIS: 1. Low flights will make even more noise than before: Although 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. This information needs to be investigated and considered by the Service’s Bio Op. 2. Sound levels for these low flights are not listed in the DEIS, and thus not addressed in the Service’s Bio Op: 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 Bio Op needs to reflect in its analysis how much actual noise exposure there will be, along with the threats posed to wildlife health, including Marbled Murrelets. 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. In addition, the Bio Op should be revised by the Service to reflect this new information and impacts on the endangered species discussed in the Bio Op. 3. 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. This information needs to be investigated and considered by the Service’s Bio Op. 4. 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. What constitutes an “event” or an “activity” is never specifically defined in the DEIS or in documents it is supposedly tiered off of. As such, it is impossible to determine the true environmental impacts of the Navy’s proposed actions. We know that the EA-18G Growlers typically operate in groups of two or three. An “event” involving Growlers would therefore potentially involve multiple aircraft flights, and perhaps more. Therefore, what the environmental documents refer to as one “event” are in fact probably multiple events involving multiple assets and perhaps lasting multiple days. This information needs to be investigated and considered by the Service’s Bio Op. 5. Reliance on out-of-date research cited, and failure to cite new research: In citing published scientific research, the Navy, and the Service by its review, included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research on the impacts of noise, summarized in 2015. The summary of the peer-reviewed research lists multiple consequences of noise less than the frequently cited 92 db. Here is the title to the article: “A synthesis of two decades of research documenting the effects of noise on wildlife”, and the citation to the 2015 peer-reviewed research: <http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract> The DEIS, and the Service by its review, also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” the citation to which is found here: <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, and thus the Bio Op fails that test. This information needs to be investigated and considered by the Service’s Bio Op. Looking next at observations from the State of Washington’s Department of Natural Resources’

pending Draft EIS for the Marbled Murrelet Long-Term Conservation Strategy (final comments are due March 9, 2017), found at <http://www.dnr.wa.gov/mmltcs>: First, regarding the definition of a 'significant disturbance event' which would impact behavior of the Marbled Murrelet (Citation from Chapter 4 (Environmental Consequences) page 4-51, of DNR's EIS (Marbled Murrelet Long-Term Conservation Strategy): "A disturbance event is considered significant when an activity causes a murrelet to delay or avoid nest establishment, flush away from an active nest site, or abort a feeding attempt during incubation or brooding of nestlings... .."However, uncertainties over the nature of murrelet responses to the range of potential disturbances, the location of murrelet nests, and the timing and location of potentially disturbing activities do not allow quantitative estimates of disturbance impacts similar to the estimates of habitat quality and quantity used to evaluate the impacts of harvest and development of murrelet habitat." Here, DNR has thus noted that there are uncertainties over the nature of murrelet responses, and the inability to produce quantitative estimates of disturbance impacts, which acknowledgement of inability to produce quantitative information where there is insufficient underlying information, should have been incorporated into the Services' Bio Op conclusions. Second, mitigation for aviation noise which is suggested in DNR's EIS could and should be applicable to the Growler Expansion, Citation from Chapter 4 (Environmental Consequences) of DNR's EIS (Marbled Murrelet Long-Term Conservation Strategy), page 4-54 thru 4-55 (Table 4.6.8): "Conservation Measure: Limiting aerial activities during nesting season Potential Disturbance Addressed: Aborted feedings, adults flushing; potential disruption of nesting behaviors Resulting Effect: Audio-visual disturbances from low-flying aircraft on nesting murrelets will be reduced in marbled murrelet conservation areas. Birds nesting outside these areas will be subject to these impacts." This mitigation was suggested for aerial application of herbicides, by aircraft flying less than or equal to 100 meters above habitat. Citation from Chapter 4, Environmental Consequences, of DNR's EIS Marbled Murrelet Long-Term Conservation Strategy, Page 4-52 thru 4-53 (Table 4.6.7). It is arguable that with supersonic jets such as Growlers, their flights over habitat would cause greater disturbance at higher altitude of flight paths than disturbance caused by aerial application of herbicides, as discussed in the DNR EIS citations above, which utilizes relatively small airplanes or helicopters that are certainly not supersonic jets. In conclusion, it is quite concerning that the assumptions, and lack of information, as discussed in this Comment, which formed the basis of the conclusions of the Bio Op, were permitted to go forward in the Bio Op when as recently as October 2016 the Washington Department of Fish and Wildlife recommended up-listing the Marbled Murrelet to Endangered Status. See page 15, cited as Desimone, S. M. (October) 2016. Periodic Status Review for the Marbled Murrelet in Washington. Washington Department of Fish and Wildlife, Olympia, Washington (found at: <http://wdfw.wa.gov/publications/01827/> (please note that 'bold' emphasis below was added by the Commenter): "**CONCLUSION AND RECOMMENDATION** Marbled Murrelets have undergone population declines nearly range-wide within the last few decades (Piatt et al. 2007, Environment Canada 2014, Falxa and Raphael 2016). Murrelets in Washington have declined 4.4% per year between 2001 and 2015. There has been an apparent centennial decline in availability of forage fish prey resources, which in combination with nesting habitat loss, appears to have compromised nest success and survival of young. Despite progress in implementing federal forest management plans, habitat conservation plans, and state Forest Practices Rules, habitat loss has continued and the Washington Marbled Murrelet population has experienced a

decline of approximately 44% over 15 years. The murrelet's low reproductive rate requires high survivorship of young for the population to grow. The magnitude of the population decline indicates that the status of the Marbled Murrelet in Washington has become more imperiled since state listing in 1993. Without solutions that can effectively address the major threats in the short-term, it is likely the situation for Marbled Murrelets will only worsen and the species could be lost from some landscapes in the decades ahead. Therefore, our recommendation is to up-list the Marbled Murrelet to the status of a state endangered species in Washington." In conclusion, the DEIS, through its use of the Services' Bio Op, omitted far too many pieces of information from the DEIS, and thus the conclusions set out in the Bio Op regarding the marbled murrelets' status and adverse impacts of the activities proposed in the DEIS are not supportable. The DEIS and the Bio Op should be redone and resubmitted to address the concerns raised in this Comment. Respectfully submitted, [REDACTED] Maple Falls, WA 98266

February 22, 2017

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

**RE: Draft Environmental Impact Statement (“DEIS”) for Whidbey Island Growler Airfield Operations**

Dear Sir or Madam:

Thank you for extending until February 24, 2017 the Comment Period for submitting Comments on the DEIS for the Whidbey Island Growler Airfield Operations.

I am a birder and frequently observe Marbled Murrelets in Rosario Straits, of Puget Sound. I am submitting comments regarding the potential impact of the Whidbey Island Growler Airfield Operations described in the DEIS, including the impact of increasing the size of the Growler fleet based at Whidbey Island Airfield, on the Marbled Murrelets and their habitat on the Olympic Peninsula.

These comments are submitted to be part of the public record regarding the DEIS, and I request that my comments be taken into consideration prior to issuance of the Final EIS.

First, I have concerns with the US Dept. of the Interior, Fish and Wildlife Service’s Biological Opinion (the “Bio Op”) which is part of the documentation of the DEIS.

There are several areas in the Bio Op where inappropriate assumptions are made, with the consequence that conclusions are reached with little or no foundation, and may well be incorrect. By way of example, with gratitude to other commentators on this DEIS:

a) at page 207 of Bio Op, the Service states:

*“There is no direct research on marbled murrelets that indicates that exposure to very loud sounds will cause a marbled murrelet to flush from a nest. The 92 dBA SEL threshold is derived from research on other bird species.”*

Given the limitations stated above, the Service needs to conduct studies to determine the sound exposure which will cause marbled murrelets to have an adverse reaction; merely using a number derived from research on other bird species is insufficient for addressing the issues of an Endangered Species. The Services also needs to conduct studies and revise the Bio Op with real noise level data obtained from actual on ground measurements under the actual, specifically located flight paths and heights that the Growlers will travel, wherever they travel, and at whatever power levels they travel, including all times when their afterburners are operating. These studies must also be done by time of day and by time of year. This latter consideration is particularly important in relation to nesting seasons for endangered birds. It is not sufficient to assume that training will take place at a constant number and duration of flights throughout the year, unless in fact it does.

1.a. Thank You  
 1.b. Best Available Science and Data  
 1.c. Segmentation and Connected Actions  
 10.a. Biological Resources Study Area  
 10.c. Wildlife Sensory Disturbance and Habituation  
 10.f. Endangered Species Impact Analysis Adequacy  
 19.d. Electronic Warfare  
 2.b. Scope of the Environmental Impact Statement and Analysis Conducted  
 3.b. Flight Tracks and Federal Aviation Administration Regulations  
 3.h. Runway Usage, Flight Tracks, and Altitudes  
 4.f. Noise Measurements/Modeling/On-Site Validation  
 4.m. Supplemental Metrics

b) at page 214 of the Bio Op, the Service 'assumes that training flights will be evenly distributed throughout the Olympic MOAs' and that the training flights will be 'evenly distributed throughout the year'. That is not useful when looking at nesting habitat, as it could be that training flights have a significant cluster of flights during nesting season. Therefore, the Navy needs to provide specific information on training flights to the Service and the Bio Op should incorporate that information.

c) at page 216 of the Bio Op, the Service references a study of responses of birds to helicopters and airplanes, but not to supersonic jet fighter planes. Although there does not appear to be a peer-reviewed study of impact of supersonic jet fighter planes on marbled murrelets, the choice of type of planes to review for theoretical impacts is critical as certainly supersonic jet fighter planes, with much larger engines than helicopters and smaller non supersonic jet fighter planes, will have a significantly measurable difference in noise impacts and likely cause significant adverse impacts to birds. This assumption should be revised, and the conclusions of the Bio Op should follow that correction.

d) at page 232 of the Bio Op, the Service makes assumptions about flight information, and admits that it does not know flight information, which would include:

i) frequency of flights,

ii) number of planes,

iii) transit flight paths from Whidbey Island to the testing areas over both the Pacific Ocean and the Olympic Peninsula (as those flight paths could well pass over nesting habitat of the Marbled Murrelets). Large portions of those areas between NASWI and the EWR overlie Olympic National Park, a World Heritage Site and an International Biosphere Reserve. Table 3.1-2 of the Draft EIS noted that ground level sound levels for aircraft transiting to and from NASWI can reach 116 dba, and that aircraft in transit can operate as low as 200 feet above ground level. In addition, the mobile emitter sites which the electronic warfare aircraft will be targeting are generally in the higher elevation areas of the Military Operating Areas, and are mostly located in the critical habitat of the marbled murrelet. To proceed without the knowledge of flight profiles of each training flight in these circumstances precludes the Navy and the Service from determining the real environmental impacts of the proposed action; and

iv) altitude of the planes (as the flights could be at different altitudes during different aspects of training, such as in-flight training for flying over mountainous terrain or for flying low elevation contours such as would be encountered during actual warfare);

v) speed and power levels of flights particularly when flying over the Olympic Peninsula and nesting habitat of the Marbled Murrelets;

The Bio Op should be revised to include this information.

e) at page 273 of the Bio Op, the Service assumes no impact from distant flyovers of supersonic jet flights over nesting areas that are 'likely to be exposed' but that distant flyovers will not likely to disturb nesting (though more alert and vigilant behaviors may be observed) or fitness consequences occur (*last sentence in 2nd paragraph on page*).

Given what is at risk, (as discussed later in this Comment) that the State of Washington is in the process of up-listing the status of the Marbled Murrelet to 'Endangered', the Service inappropriately reached that conclusion when there is no information as to specifics of flights over habitat and there was no acknowledgement in the Bio Op that there will be flights during transit from Base to Training areas which fly low over landscape as part of training. The Bio Op should be revised to incorporate this information.

f) the Service does not address in the Bio Op the locations of the electronic emitter sites which will be used by the Whidbey Island Growlers, but that information would be critical for obtaining a better understanding of the impacts of flyovers by the Growlers on marbled murrelet nesting habit. It appears that Figure 3.2-6 of the EWR EA shows that emitter sites 1 through 8, 12 through 15, will all be located in marbled murrelet critical habitat, and should be reviewed by the Service for incorporation into the Bio Op.

g) at page 269 of the Bio Op, the Incidental Take analysis merely focuses on impacts of training over marine zones, inland waters and offshore waters, and does not even address the incidental take which might occur as a result of supersonic jet planes flying over nesting habitat and causing sufficient stress which could result in reproductive failures as well as physical harm to the birds due to hearing loss. The Bio Op should be revised to take into consideration these impacts as part of the Incidental Take analysis.

Several additional aspects of missing information in the DEIS will have consequences for the assumptions made by the Service in the Bio Op, and a list of those aspects follows, with gratitude to other commentators on this DEIS:

**1. Low flights will make even more noise than before:** Although 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. This information needs to be investigated and considered by the Service's Bio Op.

**2. Sound levels for these low flights are not listed in the DEIS, and thus not addressed in the Service's Bio Op:** 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 Bio Op needs to reflect in its analysis how much actual noise exposure there will be, along with the threats posed to wildlife health, including Marbled Murrelets. 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. In addition, the Bio Op should be

revised by the Service to reflect this new information and impacts on the endangered species discussed in the Bio Op.

**3. 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. This information needs to be investigated and considered by the Service's Bio Op.

**4. 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. What constitutes an "event" or an "activity" is never specifically defined in the DEIS or in documents it is supposedly tiered off of. As such, it is impossible to determine the true environmental impacts of the Navy's proposed actions. We know that the EA-18G Growlers typically operate in groups of two or three. An "event" involving Growlers would therefore potentially involve multiple aircraft flights, and perhaps more. Therefore, what the environmental documents refer to as one "event" are in fact probably multiple events involving multiple assets and perhaps lasting multiple days. This information needs to be investigated and considered by the Service's Bio Op.

**5. Reliance on out-of-date research cited, and failure to cite new research:** In citing published scientific research, the Navy, and the Service by its review, included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research on the impacts of noise, summarized in 2015. The summary of the peer-reviewed research lists multiple consequences of noise less than the frequently cited 92 db. Here is the title to the article: "*A synthesis of two decades of research documenting the effects of noise on wildlife*", and the citation to the 2015 peer-reviewed research:

<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>

The DEIS, and the Service by its review, also failed to consider an important 2014 study called "*Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds*," the citation to which is found here:

<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, and thus the Bio Op fails that test. This information needs to be investigated and considered by the Service's Bio Op.

Looking next at observations from the State of Washington's Department of Natural Resources' pending Draft EIS for the Marbled Murrelet Long-Term Conservation Strategy (final comments are due March 9, 2017), found at <http://www.dnr.wa.gov/mmltcs>:

First, regarding the definition of a 'significant disturbance event' which would impact behavior of the Marbled Murrelet (Citation from *Chapter 4 (Environmental Consequences) page 4-51, of DNR's EIS (Marbled Murrelet Long-Term Conservation Strategy)*):

"A disturbance event is considered significant when an activity causes a murrelet to delay or avoid nest establishment, flush away from an active nest site, or abort a feeding attempt during incubation or brooding of nestlings..."



... "However, uncertainties over the nature of murrelet responses to the range of potential disturbances, the location of murrelet nests, and the timing and location of potentially disturbing activities do not allow quantitative estimates of disturbance impacts similar to the estimates of habitat quality and quantity used to evaluate the impacts of harvest and development of murrelet habitat."

Here, DNR has thus noted that there are uncertainties over the nature of murrelet responses, and the inability to produce quantitative estimates of disturbance impacts, which acknowledgement of inability to produce quantitative information where there is insufficient underlying information, should have been incorporated into the Services' Bio Op conclusions.

Second, mitigation for aviation noise which is suggested in DNR's EIS could and should be applicable to the Growler Expansion, Citation from *Chapter 4 (Environmental Consequences) of DNR's EIS (Marbled Murrelet Long-Term Conservation Strategy)*, page 4-54 thru 4-55 (Table 4.6.8):

*"Conservation Measure: Limiting aerial activities during nesting season*

*Potential Disturbance Addressed: Aborted feedings, adults flushing; potential disruption of nesting behaviors*

*Resulting Effect: Audio-visual disturbances from low-flying aircraft on nesting murrelets will be reduced in marbled murrelet conservation areas. Birds nesting outside these areas will be subject to these impacts."*

This mitigation was suggested for aerial application of herbicides, by aircraft flying less than or equal to 100 meters above habitat. Citation from *Chapter 4, Environmental Consequences, of DNR's EIS Marbled Murrelet Long-Term Conservation Strategy*, Page 4-52 thru 4-53 (Table 4.6.7).

It is arguable that with supersonic jets such as Growlers, their flights over habitat would cause greater disturbance at higher altitude of flight paths than disturbance caused by aerial application of herbicides, as discussed in the DNR EIS citations above, which utilizes relatively small airplanes or helicopters that are certainly not supersonic jets.

In conclusion, it is quite concerning that the assumptions, and lack of information, as discussed in this Comment, which formed the basis of the conclusions of the Bio Op, were permitted to go forward in the Bio Op when as recently as October 2016 the Washington Department of Fish and Wildlife recommended up-listing the Marbled Murrelet to *Endangered Status*. See page 15, cited as Desimone, S. M. (October) 2016. *Periodic Status Review for the Marbled Murrelet in Washington*. Washington Department of Fish and Wildlife, Olympia, Washington (found at: <http://wdfw.wa.gov/publications/01827/> (please note that 'bold' emphasis below was added by the Commenter):

#### **"CONCLUSION AND RECOMMENDATION**

*Marbled Murrelets have undergone population declines nearly range-wide within the last few decades (Piatt et al. 2007, Environment Canada 2014, Falxa and Raphael 2016). Murrelets in Washington have declined 4.4% per year between 2001 and 2015. There*

*has been an apparent centennial decline in availability of forage fish prey resources, which in combination with nesting habitat loss, appears to have compromised nest success and survival of young. Despite progress in implementing federal forest management plans, habitat conservation plans, and state Forest Practices Rules, habitat loss has continued and the Washington Marbled Murrelet population has experienced a decline of approximately 44% over 15 years. The murrelet's low reproductive rate requires high survivorship of young for the population to grow. **The magnitude of the population decline indicates that the status of the Marbled Murrelet in Washington has become more imperiled since state listing in 1993. Without solutions that can effectively address the major threats in the short-term, it is likely the situation for Marbled Murrelets will only worsen and the species could be lost from some landscapes in the decades ahead. Therefore, our recommendation is to up-list the Marbled Murrelet to the status of a state endangered species in Washington.***

In conclusion, the DEIS, through its use of the Services' Bio Op, omitted far too many pieces of information from the DEIS, and thus the conclusions set out in the Bio Op regarding the marbled murrelets' status and adverse impacts of the activities proposed in the DEIS are not supportable.

The DEIS and the Bio Op should be redone and resubmitted to address the concerns raised in this Comment. Otherwise, I support the No Action Alternative provided in the DEIS.

Respectfully submitted

[REDACTED]  
Maple Falls, WA 98266  
[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 [Redacted]
2. Organization/Affiliation
3. Address Lopez
4. E-mail
5. Please check here [checked] if you would NOT like to be on the mailing list
6. Please check here [checked] 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.q. Potential Hearing Loss
4.r. Nonauditory Health Effects
4.t. Noise Mitigation
7.h. San Juan Islands National Monument

Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

- 1. Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).
2. Recognize the impacts of low frequency Growler noise on health.
3. Incorporate San Juan County noise reports in the EIS analysis.
4. Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.
5. Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.
6. Commit to Mitigation Measures and timelines in the Record of Decision.
7. Add your own comments here:
8. As a parent with two young children I have extreme concern for the impacts the Growlers have on them growing up - Since they were

(Continue on the back)

babies I would cover their ears & the growlers would walk them during the day and at night. Now they cover their own ears & sometimes hide under objects or yell at the planes.

9. Why do the Growlers have to be so loud?!

10. When will jet blast detectors be installed to send jet noise upward instead of blasting into San Juan County.

Oak Harbor, WA 98277

First, I don't think we can trust the Navy to do what they say they'll do or say what they'll do. The later not being that unexpected for the Navy's mission. 17 years ago when I bought my house I signed papers acknowledging the noise from the Navy based on their ongoing operations. Now that's changed and thus you can't trust the Navy. What you think you're acknowledging today probably won't be the same tomorrow. The current civil infrastructure of North and Central Whidbey cannot handle the influx of additional Navy personnel. The Deception pass bridge was built in the 1930s and does not meet the infrastrucure and capacity requirements today. I think there should be a moritorium put on additional Navy growth until the suppporting infrastrucure is in place, such as highways, roads and housing. I can't even make a left hand turn at Frostad and SR20 to go into town without waiting for a small gap in long lines of cars both ways. At some point I'll have to sell and relocate for personal safety because the Navy and WADOT have been irresponsible in their obligations.


1.a. Thank You  
14.d. Bridges and Ferries  
15.a. Infrastructure  
7.c. Noise Disclosure

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:

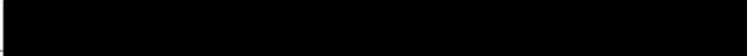
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name 

2. Last Name 

3. Organization/Affiliation resident's property owner, Lopez Is, WA

4. City, State, ZIP Lopez Island, WA

5. E-mail 

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

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

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

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

### January, 2017 Comments

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

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



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

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

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

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

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

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

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

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

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

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

- 12. Add your own comments here:

*of the above, our greatest concerns are the noise levels. We're as patriotic as any Americans and have great gratitude & respect for the military. A dearly loved cousin from my childhood was a Helidiver pilot who died in the Battle for Iwo Jima in WWII, and another cousin was career navy & a carrier Pilot. I fully recognize the need for military preparedness & training, but these planes are so noisy that they disrupt our lives when they fly over. This factor must be considered in the EIS & any decisions. There are ways to minimize or mitigate the negative effects without jeopardizing national security. Please listen to us.*

01/08/16

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

*Respectfully Submitted,*

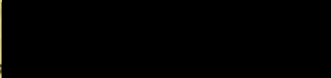


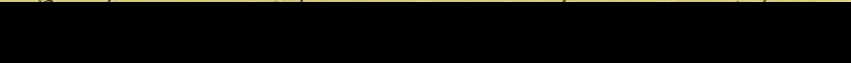
**Draft Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*


**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  *Coupeville, WASH*

4. Email *N/A*

**Comments**

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

- Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations to up to 35,000 per year (135 flight operations daily) ,will dramatically increase the residential and commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**
- Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. In 2016 over 10% of all private wells tested were found contaminated above the EPA standard . The extent full of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.

(over)

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 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.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.d. Recreation and Wilderness Analysis and Study Area
- 7.j. Impacts on Outdoor Sports

- 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: *We live at end of "Penn Cove"*

*I will not be able to continue my business of [REDACTED] as I have had for 30 years! I have lived here for 60 years and we had never been under a flight path until now. <sup>see!</sup> <sup>map!</sup> please stop flying thru Penn Cove — They are way too Low and too Noisy! and fly over state park please change your Flight path away from Here —*

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

*thank  
you*

### What else you can do

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

### To Learn More

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





**Greenbank Gardens**  
Open Daily  
in Greenbank  
**360-678-1912**  
Whidbey Island's  
peaceful woodland garden  
[www.meerkerkgardens.org](http://www.meerkerkgardens.org)



**TASTING Greenbank Farm**  
  
(360) 678-7700  
[www.greenbankfarm.com](http://www.greenbankfarm.com)

**Kurai Cottage**  
Authentic Japanese design, hot tub, panoramic view



**2006 EVENTS**

For specific dates call the Central Whidbey Chamber of Commerce at 360-678-5434 or visit: [www.centralwhidbeychamber.com](http://www.centralwhidbeychamber.com)  
**Annual events are indicated as blue**

**MARCH**  
Penn Cove Mussel Festival / Coupeville  
(In 2007 March 3-4)  
Meerkerk Gardens Spring Opening & Plant Sale

**APRIL**  
Coupeville Farmers Market... Saturdays till Harvest Fest  
Meerkerk Gardens Peak Bloom April - May  
Wine at the Shoreline / Coupeville

**MAY**  
Greenbank Farm Sunday Market... (May - Sept)  
Penn Cove Water Festival / Coupeville  
Coupeville's Memorial Day Parade

**JUNE**  
Coupeville Art & Antique Walk (held quarterly)  
Greenbank Artists Art Show  
Whidbey Island Car Show / Greenbank

**JULY**  
Concerts on the Cove / Town Park...  
Very Berry Festival / Coupeville  
Loganberry Festival / Greenbank

**AUGUST**  
Coupeville Arts & Crafts Festival  
Concerts on the Cove / Town Park...  
**SEPTEMBER**  
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**OCTOBER**  
Scarecrow Corridor / Coupeville  
Coupeville Harvest Fest - all around  
Harvest Time B & B Tour & Tass  
Uniquely Whidbey Showcase & Tra

**DECEMBER**  
Greening of Coupeville  
Island County Museum Tour of Historic Christmas in Coupeville  
Winter on Whidbey / Greenbank

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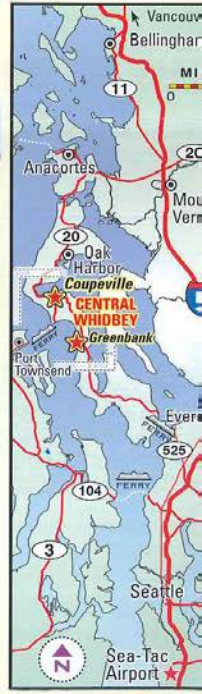
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  - Fire Department (Business).....678-3602
  - Fort Casey State Park.....678-4519
  - Fort Ebey State Park.....678-4636
  - Hospital.....678-5151
  - Library.....678-4911
  - Parks.....678-5505
  - Port District.....678-5020
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Regarding Growlers on Whidbey Island WASH

We are asking that you do not put  
all 35 growlers on Whidbey Island, WASH  
You are making us a Terrorist target -

We are a tourist and Agricultural Island!  
We are too small to support all your jets  
please put them some place Else (California  
Desert!)  
We have many parks here

for the wildlife and people to enjoy  
and the growlers are too low and loud!

We have been here since 1948!  
and have never had the jets fly over  
"Penn Cove" waters - We will loose  
our businesses of [REDACTED]

[REDACTED] than our peaceful forests.

Many other businesses will not be  
able to serve there guests + clients  
with the low, loud, disrupting noise

It is not fair that we have to  
loose our businesses because of the  
Navy's greed to have all your growlers  
going over Penn Cove (see map)

please do not bring all ~~the~~ growlers  
here and please do not fly over

the Penn Cove waters and Ft. Ebey  
state park - this is not the  
flight path! Thank you!

Regarding Growler Expansion on  
Whidby Island WA

My husband's parents moved here from  
California in 1948 and bought the  
[REDACTED] for it's wildlife  
and beauty + peaceful Penn Cove location  
my husband was in the Navy (Pearl Harbor)  
and moved to Whidby but there were  
no jets flying over Penn Cove and  
we have never been on the "flight path"  
I opened [REDACTED] over  
20 years ago for it's tranquil setting.  
Now I will have to close my business  
because of the noise of the jets  
flying so low over Penn Cove -  
Why do they have to be so loud?  
Why should we all have to loose  
our businesses? You should have  
to put the growlers some where  
else! We should not have them  
all here! It is not fair to us,  
we can not move but you can put  
the growlers somewhere other than  
our tiny Island! What if you  
created a disaster where would we go?  
please dont bring them here!  
thank you - the [REDACTED]

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 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.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.a. General Noise Modeling
- 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



**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~~ <sup>Feb 24</sup>

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

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

1. Name [REDACTED]

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

3. Address [REDACTED] Coupeville WA

4. Email AG/A

**Comments**

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

**Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations to up to 35,000 per year (135 flight operations daily) ,will dramatically increase the residential and commercial areas impacted by noise. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. In 2016 over 10% of all private wells tested were found contaminated above the EPA standard . The extent full of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.

- 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:

I will not be able to do Business [REDACTED] in peace + quiet if we have jets flying over my home + business - I have had my business for over 20 years here. We have lived here since 1948 and have never been under a flight path please did not have them fly over "Penn Cove" (see map) or be quiet!

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

### What else you can do

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

### To Learn More

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



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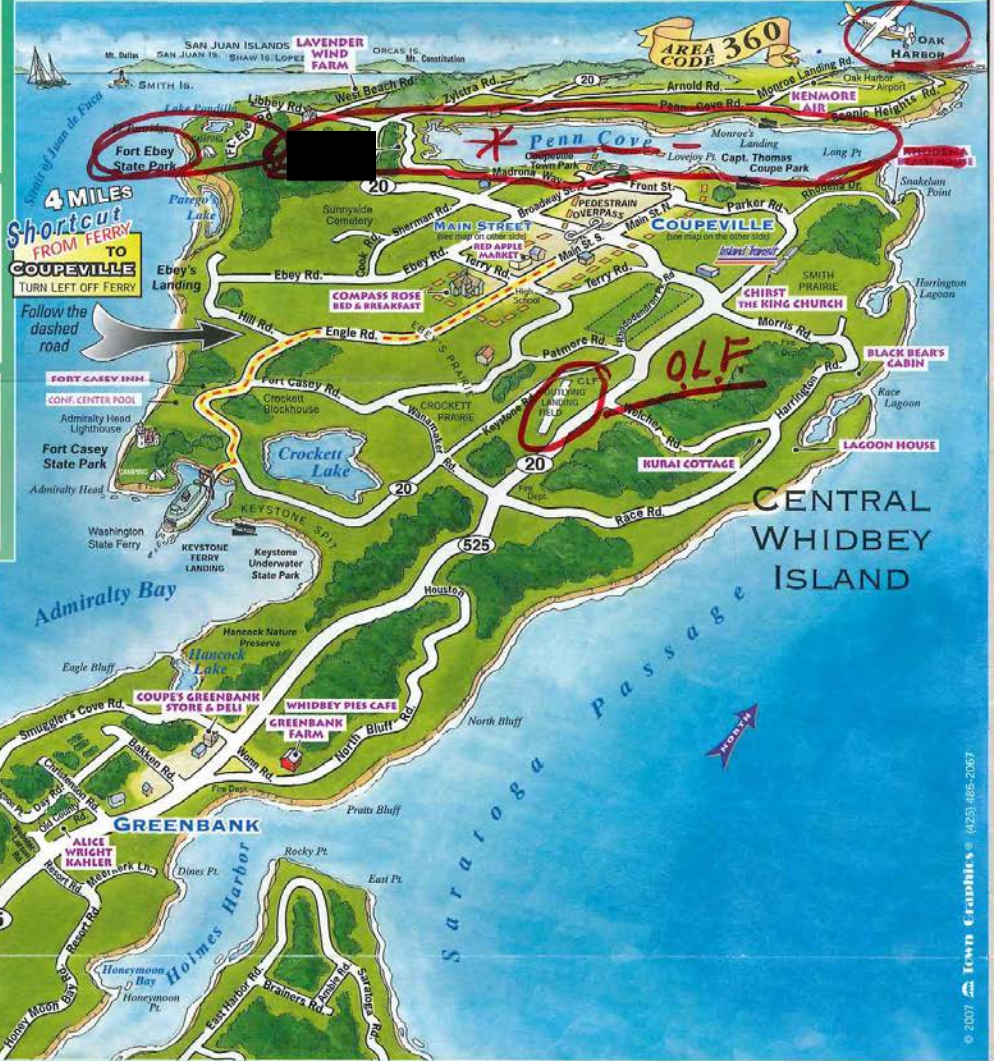
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**2007-2008 EVENTS**

For specific dates call the Central Whidbey Chamber of Commerce at 360-678-5434 or visit: [www.centralwhidbeychamber.com](http://www.centralwhidbeychamber.com)

**Annual events are indicated as blue**

**MAY**  
 Coupeville Farmers Market...Saturdays till Harvest Fest  
 Penn Cove Water Festival / Coupeville  
 Coupeville's Memorial Day Parade & Remembrance Ceremony

**OCTOBER**  
 Whidbey Island Farm Tour  
 Coupeville Farmers Market...Last for the season  
 Uniquely Whidbey Expo & Home Show

**NOVEMBER**  
 Coupeville Lodgings Open House  
 -B & B Tour

**DECEMBER**

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**2007-2008 EVENTS**

For specific dates call the Central Whidbey Chamber of Commerce at 360-678-5434 or visit: [www.centralwhidbeychamber.com](http://www.centralwhidbeychamber.com)

Annual events are indicated as blue

**MAY**

Coupeville Farmers Market...Saturdays till Harvest Fest  
 Penn Cove Water Festival / Coupeville  
 Coupeville's Memorial Day Parade & Remembrance Ceremony

**JUNE**

Coupeville Art & Antique Walk  
 Wharf Festival / Downtown Coupeville

**JULY**

Loganberry Festival / Greenbank Farm

**AUGUST**

Historic Coupeville Arts & Crafts Festival  
 Island County Fair

**SEPTEMBER**

Coupeville Arts & Antiques Walk  
 Plain Air Painter's US Open Competition  
 Whidbey Island Kite Festival / Coupeville  
 Tour de Whidbey

**OCTOBER**

Whidbey Island Farm Tour  
 Coupeville Farmers Market...Last for the season  
 Uniquely Whidbey Expo & Home Show

**NOVEMBER**

Coupeville Lodgings Open House  
 -B & B Tour

**DECEMBER**

Coupeville Art & Antique Walk  
 Greening of Coupeville  
 / Christmas Parade

**MARCH '08**

Coupeville Arts & Antiques Walk  
 Penn Cove Mussel Festival / Coupeville

**APRIL '08**

Coupeville Farmers Market...Opens for the season  
 Whidbey Island Marathon

**MAY '08**

Penn Cove Water Festival / Coupeville  
 Coupeville's Memorial Day Parade & Remembrance Ceremony



The red dots indicate pick-up locations for Whidbey Shuttle

**CENTRAL WHIDBEY VISITOR & INFORMATION CENTER**  
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Visitor Center (360) 678-5434

It's not easy to get lost in Coupeville! Main Street is just one mile long from the Historic District to the High School... and Highway 20 divides that mile in half. You will want to "get lost" in the surrounding Central Whidbey landscape where nearby preserved parks, trails, forest, farmland, bluffs and beaches abound. We invite you to start your exploration at our Visitor Center where local information, good maps guides for Ebey's Landing, restaurant menus, and free lodging referrals come with a smile.

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  - 'Business) ...678-3602
  - Park ...678-4519
  - ark ...678-4636
  - 678-5151
  - 678-4911
  - 678-5505
  - 678-5020
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  - nbank ...678-6808
  - 678-4422
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Seattle, WA 98144

Please do NOT permit Growler Airfield Operations to allow testing on Whidbey Island, for many reasons. I have listed three below: 1. Piecemealing projects to avoid analyzing cumulative effects is illegal. 2. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations. 3. There are no alternatives proposed in this DEIS that would reduce noise. Thank you.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 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

Seattle, WA 98144

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# Public Meeting Comment Form

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

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

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

- 1. Name [REDACTED]
- 2. Organization/Affiliation none
- 3. Address [REDACTED] Langley, VA 23060
- 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

*To whom it may concern - I attended your public meeting, read your initial report + comments - I have read newspaper articles regarding the increase of Growler flights & spoken to citizens of Coquille regarding noise & water issues & now I have pondered my own feelings & thoughts that I would like to share with you - I think you have received many comments expressing peoples' concern, anger & frustration - so it would just*

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

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated



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.

Like to offer suggestions for Alternatives to your current plans —

1. Couldn't you perform + practice many of your flights East of the mountains of Gibraltar Navy Base in Idaho — & then when your pilots have had enough practice they could accomplish their final test flights at the Coopersville Touch Down Field —? This would be a compromise reducing the Crowder Impact in Coopersville & still accomplish your need to practice —

2. About the water — can you replace your fire retardant chemical sprays with something less toxic? Surely you don't want to perpetuate delivery bottled water to families in perpetuity? (Have you don't want to permanently HARM (Poison the water) of one of the only remaining streams in the United States plus I have a FLINT Michigan situation on your hands in a TOURIST destination, highly valued Agricultural area — ???

3. My 3<sup>rd</sup> comment is one based upon our NATIONAL Security — Why would the Navy conduct all of its Stealth magnetic warfare in one place? The Olympic Games

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

Please print

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

Naval Facilities Engineering Command Atlantic

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

**YOUR INPUT MATTERS**



insula must not be the only place on the West or East Coast that is desirable for this type of testing - Maybe spread out some of the testing and therefore reduce the impact in one area?

~~we~~ Many residents of Whidbey Island and Island County have benefitted from the Navy's participation in partnering with our Land Trust, contributing funds to preserve much of Island County's Open Spaces, beaches and farmlands & we also have benefitted from your past participation in our United Way Campaigns & spill-over employees that are mostly Navy wives - I personally have hired & appreciated many women whose husbands & partners have been stationed with the Navy, & personally I am grateful for all of these interactions & collaborative relationships.

My sincere feeling is that your current program design places an extreme burden on one small community - & so I respectfully request you consider a compromise that will lessen the consequences to Island County's County Seat & one of the environmental gems of United States of America.

Thank you for your attention  
to my suggestions!



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.

Seattle, WA 98117

1.a. Thank You  
12.h. Tourism

We have owned a home in Seattle for 34 years and have visited Whidbey Island and the San Juans several times a year over that period - shopping, eating out, staying in hotels. If the noise from the growlers and from military machines in general continues to grow, we will be forced to spend our tour dollars elsewhere. Why hike on Ebey's Landing or on Lopez when the roar of war machines is bearing down upon you? Do NOT increase the number of Growlers. Cease and desist!

Whidbey island, WA 98249

1.a. Thank You  
12.j. Property Values  
19.d. Electronic Warfare

This issue with the growlers, with the navy wanting to use the Olympic national park to test weaponry of a type known to disrupt life, health in animals and humans, this need to destroy lot property values, this constant pollution of our island weeks and water only water source MUST STOP.



# 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 home owner

3. Address [REDACTED] Oak Harbor 98277

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

Is the timeline of this project being coordinated w/ WAS DOT'S plans to obstruct Hwy 20 by constructing 2 roundabouts in 2018? If not - suggest you do! If yes, what kind of suggestions could be made to Whidbey residents to weather this "construction storm?"

Nice presentation. Thank you.

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

1.a. Thank You

2.n. Alternatives Considered But Eliminated

I am against the Navy increasing the number of Growlers for flight practice over the greater Puget Sound area, including the Olympic Peninsula, Olympic National Park and Salish Sea. This negatively impacts too many people's livelihood and reason for living in and visiting this pristine area. Please take the Growlers to another less populated location for practice. I would like the Navy to pick another location, one that is less populated and popular for visitors, to do their Growler training.

Port Townsend, WA 98368

Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable."

(<https://www.hudexchange.info/programs/environmental-review/noiseabatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field

- 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

(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/ProgramAreas/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-RiskAlert-for-AFF-F.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.

Anacortes, WA 98221

1.a. Thank You  
4.t. Noise Mitigation  
7.c. Noise Disclosure

I purchased a home in the vicinity of Lovric's boatyard in May 2015. Prior to the purchase I consulted NAS Whidbey data to confirm that the area was not impacted by flight operations. Similar to the DEIS, no analysis identified Anacortes as being impacted by Navy field operations. I was provided NO disclosures that landing operations occur over Anacortes. To my surprise, the following winter, EA-18G operations did in fact occur periodically, typically totaling not more four in a 24 hour period. Media reports of a commanders presentation before the Anacortes City Council indicated that these operations are typically seasonal, an assertion which is supported by my subsequent observations. My residence is situated at about 100' MSL. The seasonal approach used by the EA 18G aircraft goes right over my residence, wheels down. I estimate they are under 1500' MSL. They are obnoxiously loud, perhaps peaking at over 160 dB. I support the military and am willing to tolerate a level of operations, which I have defined as 4/day, however during the week of 9 Jan 17, there was a five operations on a date I did not record. I am most concerned that with the proposed additional squadrons, operations over Anacortes and my residence in particular could increase substantially. I request that the EIS address anticipated additional operations in this area and explain why overflight over developed areas is necessary when undeveloped portions Guemes Island and Rosario Straight, which appear to accommodate most operations based on the DEIS noise analysis, could mitigate the expansion of the impacts without appreciably affecting these seasonal landing operations. The Navy is an integral part of the Anacortes community and generally a good neighbor. I am hopefully that the DEIS can provide supporting documentation to address potential impacts on the community of the proposed expansion so as to preserve and further strengthen this relationship.

1.a. Thank You

Oak Bay. Victoria , British Columbia V8R2N4

We would like to see more fly bys over Victoria with those F 18 Growlers. Some 16s would be nice too if you have any.

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

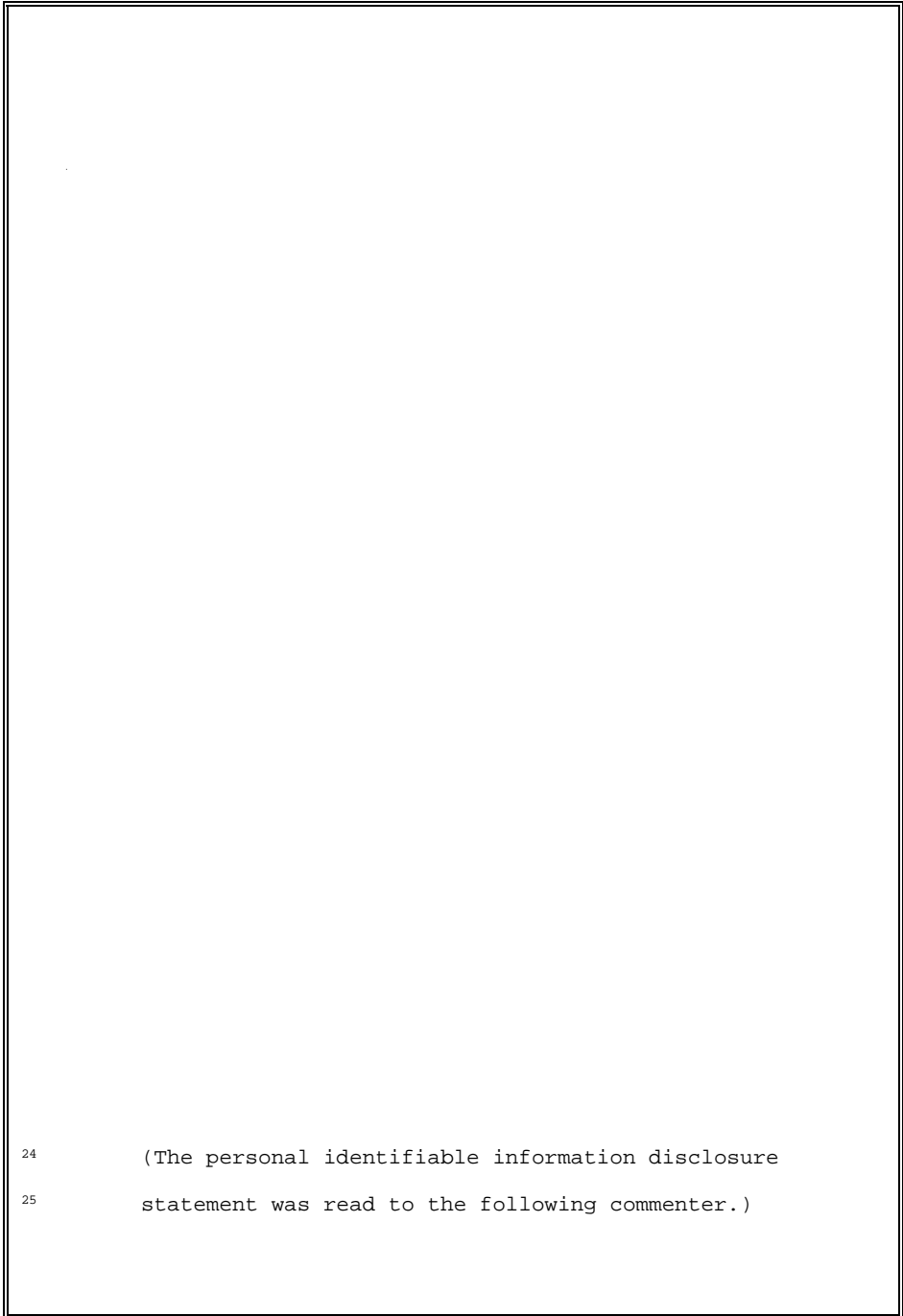
PLACE: Elks Lodge Grand Hall  
155 North Ernst Street  
Oak Harbor, Washington

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

REPORTED BY: Mary Mejlaender, CCR No. 2056  
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(425) 259-3330



24 (The personal identifiable information disclosure  
25 statement was read to the following commenter.)







# Public Meeting Comment Form

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

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

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

1. Name

2. Organization/Affiliation

3. Address

4. E-mail

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

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

As studies have not been done to determine the impact of the current flight schedule on threatened species and the projected impact of that schedule has not been evaluated for accuracy it would not be appropriate to increase activity. Such studies are vital before progressing.

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.m. Impacts to Marine Species and Habitat

**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](http://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)  
HEARING DAMAGED CITIZEN

3. Address [REDACTED], COUPEVILLE 98239

4. Email [REDACTED]

5. Phone [REDACTED]

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

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeveis](http://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.**
- Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.
- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

(over)

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
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- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 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
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.j. Impacts on Outdoor Sports



- ☒ 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:

- LITTLE LEAGUE PLAYFIELD UNUSABLE DURING OPERATIONS
- THESE NAKED ENGINES WAY TOO POWERFUL TO ALLOW NEAR POPULATION CENTERS HERE. TOUCH AND GO EXERCISES AT OLF (GROUND LEVEL) PARTICULARLY DAMAGING TO CLOSE IN RESIDENCES, SCHOOLS, PARKS, INDUSTRIES, ETC. I COULD CLEARLY READ UNDERSIDE LETTERING ON ASCENDING AIR CRAFT AT RHODADENDRON STATE PARK, DIRECTLY ON FLIGHT PATH AT END OF OLF. WAY TOO CLOSE!!!

What else you can do

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

To Learn More

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

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS.

Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

JANUARY 17, 2017

EA-189/EIS PROJECT MGR.  
NAVFAC ATLANTIC - ATTN, CODE EV2V/SS  
6506 HAMPTON BLVD.  
NORFOLK, VA. 23508

GENTLEMEN,

WE AND MANY RETIRED RESIDENTS LIVE  
AROUND OUTLYING FIELD COUPEVILLE WHIDBEY  
ISLAND, WASHINGTON STATE, A.K.A. OLF.  
I AM WRITING TO PROTEST SERIOUS DEFECTS  
IN YOUR PROPOSED DRAFT ENVIRONMENTAL  
IMPACT STATEMENT REGARDING "TOUCH AND GO"  
EXERCISES AT OLF

"SIMULATIONS" AND "AVERAGE" NOISE LEVEL  
STATEMENTS IN E.I.S. STUDY DELIBERATELY  
MISCHARACTERIZE PEAK NOISE LEVELS  
EXPERIENCED DURING TOUCH AND GO  
OPERATIONS WHICH CAUSE DISCOMFORT  
AND EAR DAMAGE IN EXCESS OF E.P.A.  
LIMITS, DOCUMENTED AND IN YOUR  
POSSESSION FROM COER PREVIOUSLY.  
FLIGHT DECK PERSONNEL ARE REQUIRED  
TO WEAR EAR PROTECTION FOR THE SAME  
NOISE LEVELS YOU INFLICT ON THE WHOLE  
COMMUNITY!

INCREASED OPERATIONS AT AULT FIELD  
AND OLF HAVE SIGNIFICANTLY INCREASED  
RESIDENTIAL AND RELATED OCCUPANCIES  
AND MODERN ADVANCED ENGINE NOISE ARE  
BEYOND ACCEPTABLE LIMITS AT OLF AND  
MUST BE TERMINATED! BIG HEALTH ISSUE!

TIME TO RELOCATE OLF !!!

[REDACTED] (RET. P.E.)  
[REDACTED] COUPEVILLE, WA, 98239

cc: COER

Port Townsend, WA 98368

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

Please grant a 45-day timeline extension for this issue.

Port Townsend, WA 98368

The Olympic Rainforest is one of the treasures of the world. The ecosystem here is already under stress. Military personnel fall in love with this place and move here. You are not protecting anything when you destroy it. The environmental impacts of war games and the Growlers are already very clear. I live in Port Townsend, and I beg you to stop this madness. You are protecting what? Who? Not me, not with these actions.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 19.d. Electronic Warfare
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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.

Tacoma, WA 98407-3625

Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable."

(<https://www.hudexchange.info/programs/environmental-review/noiseabatement-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/ProgramAreas/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-RiskAlert-for-AFF-F.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]



Grass Valley, CA 95949

I support a 45 day extension on the comment period onThe Navy's Draft Environmental Impact Statement to add 36 more Growlers to NASWI December is one of the busiest times of the year. The public needs more time to add imput. Thank You, [REDACTED]

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

1.a. Thank You

Grass Valley, CA 95949

The operations at Growler Airfield are bad for people and the environment.

1.a. Thank You

Oak harbor, WA 98277

I SUPPORT OLF!!! Keep them flying NASWI is a blessing to our country!

Freeland, WA 98249

Hi! I'd like to first state that my wife and I have immense respect for our military and the need to train so personnel can be at their best when protecting us both abroad and here at home. Before this EIS draft came out late last year, we bought a nice piece of acreage in Coupeville to build on. We were made well aware of the jet noise, given noise contour maps, and made great effort to visit the land when the jets were flying at OLFC and to observe, over time, how often it happened. In the time that we observed the jets (early-to-mid 2016), my wife and I agreed that, although the noise was uncomfortable and disruptive, the jets simply did not fly often enough at OLFC to deter us from an otherwise idyllic location and community, so we decided to purchase the land. To our surprise we found out -- months after buying the land -- that this new EIS draft states that the Navy wants to increase OLFC flights from an occasional noise nuisance (which is tolerable) to an all day, every day ordeal. If Scenario A becomes a reality, we may have to eventually abandon our plans to make a life in Coupeville, and likely at a notable financial loss to boot. I'm also concerned about how daily year-round flights would impact the character and culture of the town of Coupeville. Coupeville is a special place within Washington due to its beautiful landscapes, wonderful beaches, stunning views, semi-rural character, reasonable proximity to the Seattle Metro Area via the Clinton-Mukilteo ferry, and the wonderful Olympic Rainshadow effect that relieves much of the often gloomy fall-winter-spring weather that is so common to the I-5 corridor. There is no comparable place to move to. Please genuinely consider the impact to Coupeville that would occur if Scenario A or B were chosen. Scenario C would still represent an increase in overall disruption, but would likely remain within the realm of tolerable to enjoying life in Coupeville. Beyond the scenarios offered in the EIS, I hope that you also seriously consider the following ways to mitigate, reduce, and/or remove the sound burden over this area: - Create and publicize more accurate noise contours for the region. I've recently learned that the DNL noise contours represent a yearly average, including times with no jets are flying, and have nothing to do with how loud the jets will be over a given area \*when they are actually flying\*. The DNL metric is only useful at places that fly 24/7, such as commercial airports. These contour maps, which are what local real estate agencies have to hand out, strike me as both useless and misleading. Please give prospective residents of the area more relevant information so they can make informed decisions about whether they can live here or not. - Develop and install some kind of muffler on the Growlers that would notably reduce the deep, wide, and penetrating sound they make. - Vastly increase the use of flight simulators that could recreate conditions at sea far more accurately than OLFC can, thus minimizing the need for live training operations. - Relocate FCLP training to a newer, larger OLF that is far more remote than Whidbey has become over the years and/or has far more Navy-owned land to fly over so residential disruption is minimal or none. Of the scenarios offered in the EIS, I respectfully yet strongly request that you choose Scenario C. Oak Harbor is a strong Navy town that is better equipped to withstand the drawbacks of the training. Coupeville has a history and character that predates the Navy which should be respected and nourished as much as is reasonably possible. Thank you so much for taking the time to read this message along with all the other messages sent during this comment period! [REDACTED] P.S. Please include information about the well water contamination issue in the final EIS. It's

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 11.d. Per- and Polyfluoroalkyl Substances  
 12.j. Property Values  
 2.m. Record of Decision/Preferred Alternative  
 2.n. Alternatives Considered But Eliminated  
 4.d. Day-Night Average Sound Level Metric  
 4.g. Average Annual Day/Average Busy Day Noise Levels  
 7.a. Regional Land Use and Community Character  
 8.e. Outlying Landing Field Coupeville and Coupeville History  
 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

important for the community to have detailed information about where the issue is, what is causing it, and what will be done about it.

Mount Vernon, WA 98273

The proposed expansion of EA-18G Growler operations at NAS Whidbey Island will have an adverse impact on my family and community. I'm deeply troubled by the direct, indirect and cumulative impacts that increasing the number of EA-18G Growlers at NAS Whidbey Island will have on human health, quality of life, recreation, and economic issues in Skagit, San Juan and Island Counties. Noise concerns As reported in the draft EIS, the number of concerns expressed regarding noise were more than double any other single issue submitted in public comments. As a resident of western Skagit County, living on the north fork of the Skagit River between 4 and 5 miles east of Ault Field, I can attest to the critical importance of this issue. I found the Draft EIS sections related to noise quite informative. However, I'm deeply troubled that the Navy continues to rely on computer modeling without sampling real noise from the ground to capture our actual experience or that of others living on the various flight paths. We live on the direct flight path for inbound aircraft landing from the east. To really appreciate the full impact of the noise from these aircraft, the noise studies conducted for the EIS should have included actual ground-based data along this flight path, including sampling noise generated aft of the aircraft as they are approach NASWI. Without that data, I can tell you that we find the Navy's report that we are somewhere within the 65 to 75 noise contours to be entirely misleading. As the draft report states, the sound exposure level is dramatically lower one mile to either side of the flight path. The only point of interest located anywhere close to our residence is R04 at Pull and Be Damned Road, which is probably a mile north of the inbound flight path we live under. We also know that the altitude of the plane, the power level of the plane and whether the landing wheels are down as it descends in to Ault Field each makes a big difference. These should be taken into account and evaluated more thoroughly from the ground to more accurately inform the final EIS. The draft EIS discusses the timing and duration of training exercises and reports on several noise-abatement procedures in place. We live in a very quiet rural area where we grow a beautiful big garden, kayak on the Skagit River and in the Skagit Bay/Skagit Wildlife Recreation Area , explore the forest and marshlands, enjoy the wildlife and birdwatching – all of these activities are made unpleasant at best and excruciatingly painful at worst when the Growlers are flying. And this not confined just to our own neighborhood but to experiences we've had on Whidbey Island, Fidalgo Island and Guemes Island. There is virtually no ambient noise where we live, so the noise generated by the Growlers and other Ault Field operations are perhaps more disturbing than if we lived in a suburban or urban area. While the draft EIS is necessarily focused on the impact of expanding the number of planes, we are keenly aware of the adverse impact to quality of life at current levels so we are even that much more alarmed by the impact that the proposed expansion will have. During daytime operations, it is sometimes impossible to hear or be heard in phone conversations. Because I work from home, as do many of my neighbors, this impacts our ability to conduct business. While publishing schedules for flight operations has been somewhat helpful, it's still impossible to predict exactly when the more egregious noise impacts will be. In fact, in recent weeks I have been regularly checking the base Facebook page and have found the schedule information quite unreliable. Therefore, difficult to tell co-workers that I can reliably schedule a conference call without interruption or my students that we can conduct our on-line classes. We also

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experience late night exercises that last from two to three hours of continuous flights that make conversation impossible and disrupt sleep. These are horrible, even frightful, experiences for us. The discussion of the scientific literature in the draft EIS is inadequate in examining the psychosocial impacts of such profoundly disturbing events. The fact that these experiences are infrequent does not lessen their significance and it's probably actually made worse by the fact there's no predictable schedule and we have absolutely no control over timing or duration. Despite statements made in the draft EIS regarding the handling of complaints, I have never received a response or feedback to comments submitted to comment.NASWI@navy.mil, even though I always include my name and contact information. In recent weeks, I've specifically requested a response to my queries and there have been no responses. While the report describes processes that include a thorough analysis of complaints, I have no reason to believe that those procedures are followed. There has never been follow-up which could include letting me know what they found: imprudent airmanship, inexperienced pilot, inappropriate timing, power level too high, altitude too low, what else???? Without more interaction, I will continue to be frustrated by the so-called "active public relations process" and distrustful of the Navy's intentions and actual noise abatement practices. Finally, and very importantly, there are three ways discussed in the draft EIS that the Navy could take steps to reduce noise impacts at NAS Whidbey Island. However, there is no commitment made to take action. Before the Navy proceeds with any expansion of the fleet at this base, they should have in place the authority and the means to:

- Build one or more hush houses to mitigate engine run-up noise
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Social, economic and quality of life concerns

Definition from draft EIS: The combined, incremental effects of human activity, referred to as cumulative impacts, pose a serious threat to the environment. While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources. Cumulative impacts result when the effects of an action are added to or interact with other effects in a particular place and within a particular time. ... While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts takes into account all disturbances since cumulative impacts result in the compounding of the effects of all actions over time. Thus the cumulative impacts of an action can be viewed as the total effects on a resource, ecosystem, or human community of that action and all other activities affecting that resource no matter what entity (federal, non-federal, or private) is taking the actions. My underlying and deep concern is that the proposed expansion of activities at NAS Whidbey Island is one of a series of planned and proposed developments in the region that are contributing to the degradation of our human community and environment. Skagit, Island, and San Juan counties, the Olympia Peninsula and the Cascade Mountains – these are a national treasure chest full of natural resources that are now threatened by refinery expansions and increased oil tanker traffic, new pipelines, more dangerous train traffic, industrial development, a growing population with increased traffic pressure on narrow highways and old bridges, and more noise pollution. This is a rural area with prime agricultural land, a freshwater and salt water marine environment with what should be a world-class fishery, a natural environment with some of the most valuable recreational resources in the state and even the country. While expanding activities at NAS Whidbey Island alone has significant impacts, the cumulative impacts of further development in this region will have a compounding effect that does not serve our region or our country well. I implore the Navy

to fully consider the impact of the proposed expansion within the full context of development in our region. Finally, while I've chosen to emphasize my personal experiences more in this comment submission, I'd also like to draw attention to the excellent analysis done by Quiet Skies Group and add their comments to mine: 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



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

Mount Vernon, WA 98273

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Social, economic and quality of life concerns

Definition from draft EIS: The combined, incremental effects of human activity, referred to as cumulative impacts, pose a serious threat to the environment. While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources. Cumulative impacts result when the effects of an action are added to or interact with other effects in a particular place and within a particular time. ... While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts takes into account all disturbances since cumulative impacts result in the compounding of the effects of all actions over time. Thus the cumulative impacts of an action can be viewed as the total effects on a resource, ecosystem, or human community of that action and all other activities affecting that resource no matter what entity (federal, non-federal, or private) is taking the actions. My underlying and deep concern is that the proposed expansion of activities at NAS Whidbey Island is one of a series of planned and proposed developments in the region that are contributing to the degradation of our human community and environment. Skagit, Island, and San Juan counties, the Olympia Peninsula and the Cascade Mountains – these are a national treasure chest full of natural resources that are now threatened by refinery expansions and increased oil tanker traffic, new pipelines, more dangerous train traffic, industrial development, a growing population with increased traffic pressure on narrow highways and old bridges, and more noise pollution. This is a rural area with prime agricultural land, a freshwater and salt water marine environment with what should be a world-class fishery, a natural environment with some of the most valuable recreational resources in the state and even the country. While expanding activities at NAS Whidbey Island alone has significant impacts, the cumulative impacts of further development in this region will have a compounding effect that does not serve our region or our country well. I implore the Navy

to fully consider the impact of the proposed expansion within the full context of development in our region. Finally, while I've chosen to emphasize my personal experiences more in this comment submission, I'd also like to draw attention to the excellent analysis done by Quiet Skies Group and add their comments to mine: 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

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

Anacortes, WA 98221

We are well outside of the noise maps for the jets that fly from Whidbey, yet they regularly fly over us directly and are so loud you can't carry on a conversation outside until they pass. They fly up to 10 pm at night.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.n. Speech Interference (Indoor and Outdoor)

Olga, WA 98279

I am opposed to the addition of more jets to the area around the Salish Sea. On a personal note, I have severe PTSD and the sound of the jets, sometimes as early as 6:20 am until 12:20 midnight, causes extreme anxiety to me. I have worked with my health professional regarding this. The Puget Sound cannot remain healthy with the onslaught of loud noise, air pollution due to the Growler exhaust, and the pollution of the groundwater on Widbey. This effects not only humans but the Orcas, the fish and the wildlife of our once pristine home. If the poor decision to add more jets to the fleet comes to pass, where will all of the personnel and their families live? Will this call for construction of housing? If so, where? This will call for more water(which is being polluted by the presence of the airfield), electricity, roads, schools. This is a rural area of the country. I moved here to get away from noise. I purchased my land in 2010 and do not have the option to relocate. I DO NOT want additional growlers added to the fleet. I do not want the current Growlers to fly over the islands. We need peace and quiet for our health.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 12.i. Housing Access and Affordability
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

1.a. Thank You

Oak harbor, WA 98277

Pilot training is detrimental to and for the USA





# Public Meeting Comment Form

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

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

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

- 1. Name [REDACTED]
- 2. Organization/Affiliation local 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 am writing to express my concern of the expansion of EA 18 Growler Flight operations on Whidbey Island.

I am concerned for our environment - Navy already has advised the local community to test our wells for fire retardant chemicals found near their bases. The historical preserve is inconsistent with <sup>current</sup> Navy <sup>activities</sup> noise levels. The measurement of noise by the Navy was done by computer modeling that averaged periods

Please print • Additional room is provided on back

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

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

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 14.a. Transportation Impacts
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.h. Next Steps
- 3.a. Aircraft Operations
- 4.d. Day-Night Average Sound Level Metric
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

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.

of noise with long periods of silence.  
The anxiety to the local community caused by Growler noise is measureable to me and unacceptable.

Has the Navy seriously thoroughly considered jet noise reduction?

The impact on schools and our children in general is not acceptable,

What is the economic impact on tourism, loss of business and property value? Is the Navy prepared to buy out locals whose property value may decline as they expand?

Can our community even support the increased traffic pattern on our island?

Can our community even house increased personnel with limited rentals currently available?

Is the Navy adequately supporting our schools as it increases personnel on an ISLAND?

Is it even wise strategically to keep all Growlers and Growler training in one place?

After attending the Navy Forum many questions still remain about my quality of life here on Whidbey.

Thank you for your consideration.

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

Please print

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

Naval Facilities Engineering Command Atlantic

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

**YOUR INPUT MATTERS**

February 23, 2017

NACMA0002

[REDACTED]  
Oak Harbor, WA 98277

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command-Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/55

Subject: Comments on EIS for EA-18G  
Growler Airfield Operations at NAS  
Whidbey Island

## Aquifer Health

The current EIS does not address its role in the water quality of Whidbey Island. Our aquifer has been compromised by the Navy's perfluorooctane sulfonate and perfluorooctanoic acid.

Additionally a plume of 1,4-dioxane, known by the Navy since the 1980s appears to continue to expand.

The EIS needs to address historical and future water pollution issues on

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 17.a. Hazardous Materials and Waste Impacts
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation

Whidbey Island and the impact on our citizen's health and our island's environment. Thank you.

## Inadequate Noise Measuring

Instead of computer noise models, the EIS needs on the ground noise measurements. Computer averaged noise over an entire year distorts the intense sound impact on our island communities during periods of intense training. Our island's quiet nights average with the noisy daytime flight activity giving distorted data. We need real-time on-the-ground noise data collection.

Being anti the planned noise increase does not mean I am anti-Navy. My hope is the Navy can find some solutions where the local citizen's and the Navy can both have their needs met. The EIS does not suggest any alternatives where both parties win.

(3)

I am suggesting the citizens of Whidbey, together with the Navy, explore some creative solutions together that could come closer to meeting the Navy's training needs and Whidbey Citizen's quality of life.

Possible directions to explore:

- more flight simulators for training
- some landing practice on off-shore carriers
- share Growler fleets with other geographic locations.

Please help us save our quality of life here on Whidbey for it's citizens and tourists as you expand your growler training program.

Respectfully submitted,



1.a. Thank You

Oak Harbor, WA 98277

When we moved to Whidbey Island, we were aware of NAS Whidbey and the training. Although the number of and loudness of the training flights is increasing, we appreciate the presence of the Naval Base and its use increasing and the benefits of this for our community. Thank you!

Anacortes, WA 98221

I know training is very necessary, however I think the training hours should be limited to between 9AM - 9PM and should also have a limit in duration. I live near St Mary's church in Anacortes and when my windows are rattling and I can not hold a conversation in my own living room without raising my voice, something needs to be done. Can the flight patterns be changed to affect fewer people? Thank you.

- 1.a. Thank You
- 3.a. Aircraft Operations
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.t. Noise Mitigation

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

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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

Langley, WA 98260

the Navy are a bunch of scatterbrained mendacious obfuscators. Get them GONE from Whidbey Island. they are destroying our sanity, our way of life, and our economy. BE GONE !!

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 misconception 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 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

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

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

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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 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.

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 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

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

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4.r. Nonauditory Health Effects

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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.

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 Quiet Skies

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

Comments

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

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

You have so much hot air. You send all these people here to talk but it seems there is Not willingness to change what a waste.

(Continue on the back)

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

Seattle, WA 98125

Please reconsider the proposal for increased growler air traffic and war game over the Olympic peninsula. The high levels of noise and air pollution from these activities over this area will have a detrimental affect on the health and well being all who work, live and play in the area . The Peninsula includes the national forest, park, as well as tribal lands that are important to preserve as the beautiful resource that they are. I understand that the Navy does require training, because increasing their activities is was waste of fuel. Thanks for your attention

1.a. Thank You

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

6.b. National Ambient Air Quality Standards Compliance

7.d. Recreation and Wilderness Analysis and Study Area

9.a. Consideration of Tribes



# Public Meeting Comment Form

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- 1. Name [REDACTED]
- 2. Organization/Affiliation \_\_\_\_\_
- 3. Address [REDACTED] Anacortes, WA 98221
- 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

EPA Report Inaccurate And Inadequate  
for Area north of ANACORTES Forest  
See

Attachment

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

## Attachment to Public Meeting Comment Form

I live at [REDACTED] Anacortes, WA 98221. Mount Erie Elementary School is within two blocks of my residence. I am directly below runway 14A1E on page A 274. The Mount Erie Elementary School is in the same predicament. The closest point to this school and my residence on your diagrams is point S04 (Anacortes High School). Unlike Mount Erie Elementary School, my neighbors and my residence, Anacortes High School is not directly below the flight pattern. I submit your Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex is inadequate in its noise evaluation for Mount Erie Elementary School, my neighborhood and possibly Fidalgo Elementary School which is east and south of my residence.

The noise of the growler day and night is above 65 decibels. We can not function when the growler goes over our home. Clearly the schools would be unable to function until the growler was gone. If you look at your own data Anacortes High which is north of the impacted areas and not on any runway is also impacted.

Seattle, WA 98103-6207

As a member of a church group deeply concerned with the loss of undisturbed places on our planet where one can rest into Holy Nature, I beg you to consider carefully the plan to expand and enlarge your exercises on the Olympic Peninsula. It is a place I go to connect with God. Please add this Wendell Berry poem into your testimony; it speaks clearly to my concerns. "The Peace of Wild Things" When despair for the world grows in me and I wake in the night at the least sound in fear of what my life and my children's lives may be, I go and lie down where the wood drake rests in his beauty on the water, and the great heron feeds. I come into the peace of wild things who do not tax their lives with forethought of grief. I come into the presence of still water. Thank you.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area



# Public Meeting Comment Form

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

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

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

1. Name

2. Organization/Affiliation

3. Address  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

The growlers are disruptive to our lives here. They are affecting our health and sanity. You, the Navy, are supposed to protect and serve us, the people. You ARE NOT fulfilling your responsibilities to us. You are ignoring our concerns and are planning for more jets instead of fewer. We will not be collateral damage in your efforts to expand the growler program. It is YOUR JOB to find a solution to this problem. We feel completely disregarded. We are not

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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
- 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



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being heard. The growlers are RUINING OUR PEACEFUL ISLAND. I am not anti-Navy but I am against the Navy causing harm to the citizens of the United States. Find a solution. It is unacceptable for you to ignore our concerns any longer.

NEXT TIME YOU VISIT OUR ISLAND YOU NEED TO PROVIDE ALL INFORMATION IN SPANISH AS WELL AS ENGLISH.

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

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

**YOUR INPUT MATTERS**

1.a. Thank You

Oak Harbor, WA 98277

I appreciate our sailors and their families, not just for the huge economic impact and millions of dollars brought to our community, but because of the different cultures they bring to our homogeneous island. I support expansion of the Growler presence knowing the Navy will act as responsible neighbors. I thank our sailors for the sacrifices they make in the defense of our country!

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 Admirals Cove

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

- 1.  Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- 2.  Noise impacts on <sup>residential +</sup> commercial properties including agriculture. (farms)
- 3.  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:**

Our concerns are not ONLY for ourselves: these same issues affect your own Navy personel and their families, as they, too, are being exposed to the same health, noise, water quality + property value concerns.

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

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

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

Oak Harbor, WA 98277

the Navy has not addressed these issue in the EIS. 1. Water contamination to the aquifers around the base that are peoples sole sources of water. 2. Actual Noise Measurements were not made. Noise modeling is outdated and noise averaging is inappropriate. Individual measurements made by the National parks services shows noise levels far in excess of that of the predicted by average modeling. 3. Alternatives to using coupeville OLF were not adequately addressed. as their are much better suited location for these fighter/high performance jets that have millions of acres. 4. Jet Noise and Pollution reductions were not thoroughly addressed. 5. Crash frequency and impacts to local emergency services were not addressed. 6.Impacts on our children is not adequately addressed: Childhood learning disability's & hearing damage, impacts on students at all schools and parks in the flight area of these EA-18G fighter /high performance jet. 7. Economic impact on tourism and u-pick farm business, property value loss, declines of the civilian population and loss of business is not addressed adequately. 8. Impact to natural resources is not addressed: bird migration and animal habitat; impacts on Ebay's landing National Historic reserve & Deception Pass State Park and all aspects of outdoor recreation . 9. Frequency and effects of fuel dumping is not addressed.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve



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1. Name [REDACTED]

2. Organization/Affiliation CIC

3. Address [REDACTED] (Warzone) Oak Harbor WA 98277

4. E-mail [REDACTED]

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

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

1. No action, alternative for FCLP Operations

2. The noise model the navy is using is not an accurate in my area the readings I have taken run between 150dB - 110 dB. I think there is an error here with the navy's model as it can lead to misleading conclusions.

3. I am very concerned about the lack of monitoring of the air quality around NASW. The closest monitor is 5 miles away. at my house you can not breath the air when the EA-18G is flying.

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**YOUR INPUT MATTERS**

- 1.a. Thank You
- 12.e. Agriculture Analysis
- 2.c. Compliance with the National Environmental Policy Act
- 2.i. No Action Alternative
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 6.b. National Ambient Air Quality Standards Compliance

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4. The Economic impact for Whidbey has been greatly reduce from the effects of the EA186 please use an independent company to study the effect the EA186 makes. I speak from actual ~~ex~~ numbers loss on my farm. Customers walk away when planes are flying.

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

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**YOUR INPUT MATTERS**

District of Saanich, British Columbia V8X 4H2

To whom it may concern. Noise from Growler aircraft can be heard quite clearly and regularly in my residential neighborhood. The noise frequency penetrates house walls. It can negatively affect my sense of well being, especially in evenings and on weekends when I look forward to peace and quiet after a work week. I appreciate any and all efforts to help reduce the noise disruption caused by these aircraft. Thank you for your consideration.

1.a. Thank You  
4.r. Nonauditory Health Effects  
4.t. Noise Mitigation



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

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

- 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, 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-CI:Q-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.

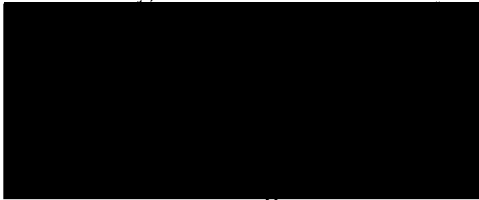
**27. Old research cited but new research not:** In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise 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,



Nardland WA 98358



Oak Harbor, WA 98277

the Navy has not addressed these issue in the EIS. 1. Water contamination to the aquifers around the base that are peoples sole sources of water. 2. Actual Noise Measurements were not made. Noise modeling is outdated and noise averaging is inappropriate. Individual measurements made by the National parks services shows noise levels far in excess of that of the predicted by average modeling. 3. Alternatives to using coupeville OLF were not adequately addressed. as their are much better suited location for these fighter/high performance jets that have millions of acres. 4. Jet Noise and Pollution reductions were not thoroughly addressed. 5. Crash frequency and impacts to local emergency services were not addressed. 6.Impacts on our children is not adequately addressed: Childhood learning disability's & hearing damage, impacts on students at all schools and parks in the flight area of these EA-18G fighter /high performance jet. 7. Economic impact on tourism and u-pick farm business, property value loss, declines of the civilian population and loss of business is not addressed adequately. 8. Impact to natural resources is not addressed: bird migration and animal habitat; impacts on Ebay's landing National Historic reserve & Deception Pass State Park and all aspects of outdoor recreation . 9. Frequency and effects of fuel dumping is not addressed.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.o. Classroom Learning Interference
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve



## Public Meeting Comment Form

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

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

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

1. Name [REDACTED]
2. Organization/Affiliation Concerned Island Citizens
3. Address [REDACTED] OAK Harbor WA 98272
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 in favor of "NO Action Alternative" or ~~to~~ Move the EA-18G to a base that is more suited for this Dangerous Aircraft like China Lake, CA or Lamont CA, or White Sands New Mexico All of these location are more suited for this Dangerous Aircraft. If we must have the NO Action is the the Preferred Alternative As that will keep the noise & air pollution Down. Danger of Crashes that will wipe out family homes & bury

The NO Action Alternative is the Preferred Alternative  
OR  
MOVE the EA-18G some were else

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.I. No Action Alternative
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 6.b. National Ambient Air Quality Standards Compliance

Bothell, WA 98021

The Olympic Peninsula is one of the last quiet places on earth. I strongly object to allowing fighter jets to occupy the air space above the peninsula. For more information on keeping the Olympic Peninsula quiet please see <http://onesquareinch.org>. Here is an overview: One Square Inch of Silence is very possibly the quietest place in the United States. It is an independent research project located in the Hoh Rain Forest of Olympic National Park, which is one of the most pristine, untouched, and ecologically diverse environments in the United States. If nothing is done to preserve and protect this quiet place from human noise intrusions, natural quiet may be non-existent in our world in the next 10 years. Silence is a part of our human nature, which can no longer be heard by most people. Close your eyes and listen for only a few seconds to the world you live in, and you will hear this lack of true quiet, of silence. Refrigerators, air conditioning systems, and airplanes are a few of the things that have become part of the ambient sound and prevent us from listening to the natural sounds of our environment. It is our birthright to listen, quietly and undisturbed, to the natural environment and take whatever meanings we may from it. By listening to natural silence, we feel connected to the land, to our evolutionary past, and to ourselves. One Square Inch of Silence is in danger, unprotected by policies of the National Park Service, or supported by adequate laws. Our hope is that by listening to natural silence, it will help people to become true listeners to their environment, and help us protect one of the most important and endangered resources on the planet, silence.

1.a. Thank You

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

7.d. Recreation and Wilderness Analysis and Study Area

Nordland, WA 98358

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 2.d. Program of Record for Buying Growler Aircraft

Greetings, I'm commenting on the EIS, on how the EA over in Olympic Peninsula and the EIS are related, and as such should all be in the EIS. 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.

Nordland, WA 98358

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water.

1.a. Thank You  
19.d. Electronic Warfare

Nordland, WA 98358

I am commenting on the lack of information on electromagnetic radiation in the EIS. 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."

Nordland, WA 98358

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

I would like the public to continue to have a chance to discuss the Growler program as it goes forward, as effects can be measured. 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.

Nordland, WA 98358

Here are more comments I'd like to make on the DEIS. Thank you for considering these. 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

- 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.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.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



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

Dear Navy, I appreciate very much that you extended the comment period to Feb 24th, 2017, giving me time to read the DEIS. I live on Marrowstone Island, where you were surprised to hear that we see and hear the Growler trainings and fly overs. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

1.a. Thank You

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

4.i. Points of Interest

Norland, WA 98358

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft

Dear Navy, I keep receiving news that the Growler training program is being presented piecemeal to the public, giving us no real idea of the total impact. Here is the latest: 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. 12 February 2016

Nordland, WA 98358

I do not want electronic warfare over my home, or over Olympic National Park which has been protected for the people, for the environment, NOT for the Navy.

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

Nordland, WA 98358

1.a. Thank You  
4.I. Points of Interest

Dear Navy, I would like to add my comment after reading the EIS. I live on Marrowstone Island where we are impacted by the FCLP on Whidbey, as well as Growler flyover in of Kilsut harbor. Marrowstone Island was not included in the DEIS, and I am requesting that it is included in the final EIS. Thank you for considering, [REDACTED]



1.a. Thank You  
12.n. Quality of Life

Coupeville, WA 98239

Thank you for the opportunity to provide this commentary. We support the Navy on Whidbey Island and value it for our national security as well as for an unparalleled boost to our local economy. We live in Admiral's Cove and knew that we would have to tolerate jet noise when we bought our home and we've found the Growlers' flight operations to be tolerable, though certainly loud, in recent years. Our only concern is a dramatic increase in these operations at OLF; in some cases, we've heard it could be 10 times as much as what has been the norm. That is not tolerable. We just ask that common sense prevail and that as a good neighbor in this island community, the Navy recognizes how a large increase in operations at OLF would sharply impact residents' quality of life. We understand the Navy needs to practice there and a moderate increase is reasonable. But a huge rise in operations, considering how loud those jets are, would really damage our quality of life here.



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

I would like to know sound level difference in ~~the~~ dB  
between ~~the at~~ at a point (eg my address)  
between The Growlers + pre Growlers. The  
info available at this Public Meeting was not  
clear on this point.

Thanks

[REDACTED] 12/9/16

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

**Please print**

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

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

**YOUR INPUT MATTERS**

Snohomish, WA 98290

1.a. Thank You  
19.d. Electronic Warfare  
9.a. Consideration of Tribes

I am 100% opposed to the proposed "War Games" to take place on the Olympic peninsula. We must protect our treaty agreements with our Native Americans. The Olympic National Park belongs to all Americans and must not become the private property of the Navy for their sole pleasure.

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

February 13, 2017

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

Attn: Code EV21/SS

We are writing to express our concern regarding the proposed increase in flight operations at OLF Coupeville. When we moved to Coupeville in 2006, our real estate agent informed us of the noise at OLF and the specific areas most impacted by flight operations. We did not have an issue with aircraft noise until the Growlers arrived in 2012.

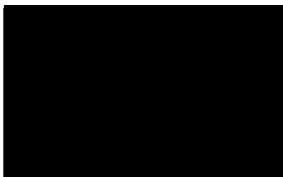
The Growlers noise level is much, much higher than what we experienced prior to their arrival. It has significantly impacted our activities – especially outdoors. We have adjusted to the level of activity experienced in 2016.

We are greatly concerned about the proposed increased activity level of activity at OLF. It would be very difficult to continue with this increased OLF activity. Scenarios 1A & 1B would increase – up to 581% - the flight hours per day we are exposed to the higher noise level. The projected area of impact would expand to include our residence. This would intolerable!

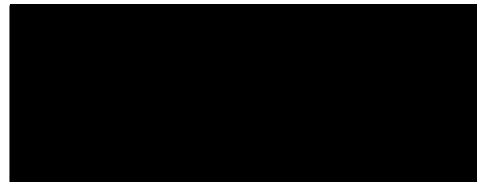
**We strongly oppose Scenarios 1A & 1B! We would never have considered relocating to Coupeville if they were in effect or being considered!!**

We are open to increased (< 25%) Growler activity not to exceed 7500 FCLP operations annually.

Signed:



Coupeville, WA 98239



Coupeville, WA 98239

Port Townsend, WA 98368

To the Naval Facilities Engineering Command Atlantic, The following points represent many hundreds of hours of concerned citizens impacted by this very important decision. I hope that you will take these comments into your consideration as all of us who live here, raise our children here and work here are very concerned. Thank you for your time. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable."

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or

- 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

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 measures 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 contamination soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had

not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]

Sequim, WA 98382

We live in Diamond Point, on the Miller Peninsula. One of the best things about our neighborhood is the peace and quiet. When your planes fly over it is really disturbing. On our neighborhood website, a new neighbor asked, "What is that rumbling we keep hearing?" It woke me up this morning. We also were snowshoeing at Hurricane Ridge a few weeks ago when a Grouse flew over. Everyone there stopped to see where the noise was coming from. It was quiet and peaceful up until then. It is definitely adversely affecting our lives. I don't know why they can't fly over the water where there aren't people living or over Seattle where it's noisy anyway.

1.a. Thank You

12.n. Quality of Life

2.n. Alternatives Considered But Eliminated

4.p. Sleep Disturbance

7.d. Recreation and Wilderness Analysis and Study Area

## 1.a. Thank You

Oak Bay, British Columbia V8R6M8

As Canadian citizens (and Oak Bay residents), my wife and I accept the noise created by the jets at the Whidbey Naval Air Station as a necessary part of protecting our way of life. We have lived in the Greater Victoria area for many years and are well accustomed to the noise. We would like you to know that our Mayor, Nils Jensen, does not speak on behalf of all Oak Bay residents. We live in a world that requires vigilance and ongoing military preparation. You certainly have our support for the work done at Whidbey Island Naval Air Station. We consider the noise the "sounds of freedom".

**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 \_\_\_\_\_ SEATTLE WA 98116 \_\_\_\_\_

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.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.l. Community Service Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 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:**

DEAR NAVY, YOU ARE COMPRISED OF MANY SMART FOLKS AND A WEALTH OF ASSETS. ASSETS DERIVED FROM US, THE TAXPAYERS. YOUR DUTY IS TO SERVE } PROTECT. CURRENTLY YOU ARE FAILING! USE YOUR SMARTS } ASSETS TO FIGURE OUT ANOTHER, BETTER OPTION!

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

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

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



Seattle, WA 98116

The 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. I'm not a military strategy genius but having the entire fleet located in one location seems like a dumb strategy and one that needs further evaluation. Thank you for considering this comment.

- 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

Pt Townsend, WA 98368

I just learned that the Navy would like to fly Growlers over the Olympic Peninsula and National Park. I am a Psychiatric Nurse Practitioner whose patients would be deeply distressed by this activity. As would I! Those of us who live on the Peninsula value the deep quiet, birds, animals and wilderness areas that feed our souls. I am deeply concerned about the severe consequences Growler activity of this magnitude would have on our wildlife, our precious National Park and our peace of mind. I entreat you: please DO NOT allow war games in our area.

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

Port Angeles, WA 98362

The area you have selected is an area surrounded by protected lands: National Parks and Forests, and also a place frequented by many tourists. Why here? Why not a place like the desert-land in Nevada or Utah, in areas where few people travel through and that has fewer animals. I hear the sounds already, where I live. It bothers some pets, and I am sure it bothers the wildlife. I understand your need for a place to do this work, but pick some place that is in the middle of nowhere and which is desolate. Thank you.

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Oak Bay, British Columbia V8S 4N2

Please reroute your Growlers away from Victoria or use methods to reduce the excessive noise that sounds like thunder or imminent earthquake, even when one is inside a building.

- 1.a. Thank You
- 3.a. Aircraft Operations
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.t. Noise Mitigation

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 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.

Friday Harbor, WA 98250

- 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).

Friday Harbor, WA 98250

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

4.d. Day-Night Average Sound Level Metric

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



Friday Harbor, WA 98250

1.a. Thank You

4.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.

Friday Harbor, WA 98250

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

Friday Harbor, WA 98250

1.a. Thank You

4.r. Nonauditory Health Effects

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

Friday Harbor, WA 98250

1.a. Thank You

4.q. Potential Hearing Loss

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

Friday Harbor, WA 98250

1.a. Thank You

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

Friday Harbor, WA 98250

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

Friday Harbor, WA 98250

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

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

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

Friday Harbor, WA 98250

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

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



Friday Harbor, WA 98250

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

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

Friday Harbor, WA 98250

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

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

Friday Harbor, WA 98250

1.a. Thank You

4.r. Nonauditory Health Effects

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

Port Angeles, WA 98362

To: EA-18G Growler EIS Project Manager Naval Facilities Engineering Command Atlantic 6506 Hampton Boulevard Norfolk, VA 23508 Attn: Code EV21/SS Subj: Navy Draft EIS – EA-18G Growlers at Naval Air Station Whidbey Island Date: February 23, 2017 Dear Sir or Madam: Thank you for the opportunity to comment on the Navy's 1400-page Growler Draft Environmental Impact Statement (DEIS). You have received more comprehensive comments than mine, especially that of the West Coast Action Alliance (WCAA). I have read their comment in its entirety and agree with all of it. I suggest that you give it your close attention since it is well-researched, complete and accurate in every way. I will attempt to not be too repetitious of their excellent response. I am a patriotic former Navy test pilot living in Port Angeles, WA. I am experienced in many Navy aircraft but mostly flew the F-4B and F-4J Phantom series. I have over 2,000 flight hours and 326 carrier landings, 106 of them at night. I was the Navy project officer for the AIM-7F Sparrow air-air missile operational evaluation and was nominated for the White Fellows program. I strongly support the Navy's mission and the vital role of the EA-18G Growler. That said, there are some serious problems with the EIS and the Navy's behavior in this initiative. The entire premise of the Navy's need to overfly critical areas of the Olympic Peninsula is incorrect. The Navy cites the 420 nautical mile distance to a range in Mountain Home Idaho as a primary problem. They fail to mention the availability of the Yakima Training Center (YTC) as an alternative. The YTC is 148 nautical miles from the YTC vs. 93 to the west end of the Olympic Peninsula. The extra 55 miles comprise about eight minutes of flying time in a Growler. The Navy has used the YTC frequently in the past and its air space is usually available. The entire reason to have a range on the Olympic Peninsula is negated by this fact. The mission of EA-18G frequently takes Whidbey operating units to NAS Fallon, NV where the Nevada Test Range is adjacent to the field. The Growler usually operates with other fleet aircraft based at NAS Lemoore, CA, NAS China Lake, CA, MCAS Miramar, CA and NAS Fallon. Commonality of parts, maintenance, command, fuel, training and communications all suggest the Growlers be based at Fallon or Lemoore. This would also solve the OLF Coupeville noise problem. They are clearly at Whidbey for historic rather than operational reasons. As the aircraft get larger, more numerous and noisier, the misfit with communities and sensitive natural areas worsens considerably. This is understated by the Navy having used noise data for the retired EA-6B Prowler in describing the Growler. This cannot have been unintentional. My recommendations are the same as those of the WCAA with two additional recommendations added at the end: 1.) Stop the practice of segmenting large projects into numerous smaller ones, and conduct cumulative impacts analyses for the full scope of functionally and geographically related activities. 2.) Provide any and all information and materials requested by state and federal agencies to undertake the reviews and consultations required of them. 3.) Hold public meetings and hearings in addition to or in lieu of Open Houses. In most cases at the latter, questioners are sent from table to table without getting answers to their questions, and their concerns and comments are not adequately documented. A proper public Q&A where everyone can hear the Navy's responses would greatly improve the public's understanding of proposed activities and provide information upon which the public may evaluate and propose alternatives that would meet the Navy's needs, as well as the public's. Further,

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.f. Endangered Species Impact Analysis Adequacy
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 4.t. Noise Mitigation
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process

the Navy must advertise in media of record in affected communities, and not assume that a small ad in the Seattle Times will be read by people living three to four hour's drive away. 4.) Incorporate and grant mitigation requests and proposals by wildlife, historic preservation, and public health agencies; so far, mitigation proposals have been reasonable. Yet the Navy as a matter of course refused to grant some of the most basic of mitigation requests. For example, refusing to allow Fish and Wildlife Service experts to train Navy personnel on spotting marbled murrelets is unwarranted, unreasonable and unjustified. 5.) Respond to requests from local governments for consultation under Section 106 of the National Historic Preservation Act; expand the Area of Potential Effect and initiate these requested consultations in order to assess impacts to these areas, including those requested by the State Historic Preservation Officer in her letter of January 9, 2017. 6.) Reinstate public comment periods and suspend "30 day wait periods" on Final Navy EISs, especially when new information has come available. 7.) Ensure that the scientific inaccuracies contained in the 2014 Pacific Northwest Electronic Warfare EA are corrected to standards that Forest Service and Fish and Wildlife Service biologists can support, and allow the public to read and comment. 8.) Employ more rigorous cumulative impacts analyses in general, including evaluations of effects on climate change and air, soil and water quality. The military is the world's largest single user of fossil fuels, and exhaust emissions beyond the narrowly defined 65 dB DNL affected areas near runways are not being analyzed. 9.) Clarify basic terms such as "event." It should be defined in each context, so that the public can understand their durations and significance. Some events last for seconds and involve one or two aircraft; others last for hours and involve multiple aircraft, and still others last for days and involve multiple aircraft, ships and submarines; the Navy must clarify the term "event" each time it is used. 10.) Fulfill the DOD-USDA 1988 Master Agreement requirements to fully substantiate the need for Defense Department use of non-military lands for electronic warfare training and military operations, by proving in a report to the public that DOD-owned lands are either unsuitable or unavailable. 11.) Provide a detailed, specific answer on whether and how the additional Navy stressors on Endangered Species Act (ESA) listed species as described in the Growler DEIS, particularly to marbled murrelets, comports with ESA Section 4F recovery, given that the acknowledged lack of scientific information on noise impacts to this species affects the ability to determine harm and cumulative effects, and also in light of precipitous declines and the December 2016 up-listing of this species by the State of Washington, from threatened to endangered. 12.) Revise the DEIS to address the 40 additional Growlers to be stationed at Naval Air Station Whidbey Island, as well as additional flying on weekends, and allow further opportunity for public comment before the Final EIS is prepared. 13.) Comply with the spirit and letter of NEPA requirements by proposing alternatives that reduce the noise, by properly and accurately evaluating noise and other impacts in all affected areas, by making actual noise measurements as well as computer modeling, and by using scientifically valid standards that measure the more realistic aspects of noise that current models don't address, as previously requested by local governments in surrounding communities. Added: 14.) Should the EA-18G aircraft continue to be based at NAS Whidbey Island, reject their operation over the Olympic Peninsula and encourage the Navy to consider the Yakima Training Center. Yes, this would require some coordination with the Army. The Joint Base Lewis McChord command structure could easily accommodate this. 15.) Encourage the Navy to consider operating the EA-18G out of either NAS Fallon, NV or NAS Lemoore, CA for reasons stated above. This would solve

their Olympic Peninsula problem and the noise issues at Whidbey and Coupeville while adding greatly to operating efficiency. Thank you for the opportunity to comment on this Draft EIS. Sincerely yours, [REDACTED] Port Angeles, WA

Port Angeles, WA 98362

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their Olympic Peninsula problem and the noise issues at Whidbey and Coupeville while adding greatly to operating efficiency. Thank you for the opportunity to comment on this Draft EIS. Sincerely yours, [REDACTED] Port Angeles, WA

Clinton, WA 98236

I am writing to express my concern that the draft EIS fails to address a variety of common sense concerns about the potential impacts of increased flights. I would like to believe that the Navy is acting in good faith when it comes to finding the right balance between considering national security concerns and environmental concerns -- the quality of life of future generations is affected by both. The omissions in the draft EIS -- no water testing, no noise impacts outside an area that a jet travels in less than a minute, etc. -- make me feel that the document pays lip service to environmental concerns and that as soon as the hurdle of submitting the document is passed, the Navy will do whatever they want. The lack of water testing in the draft EIS is of increased concern to me in light of the new evidence that contamination has already occurred, and the potential widespread impact of the contamination. I am a farmer on South Whidbey, and I advertise my produce in Seattle as being from Whidbey. Several Seattle news outlets have run headlines announcing the contamination of Whidbey Island wells. There is no concern that my well is contaminated, but it is not good for my business to have Whidbey Island associated in potential customers' minds with contaminated water. I would appreciate it if the Navy would consider potential impacts on water and soil as a valid environmental -- and economic -- concern. Thank you.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

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

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Oak Harbor, WA 98277

This EIS includes a thorough body of research and presents alternatives for home basing additional EA-18G aircraft at NAS Whidbey Island. As a resident in the area and proud supporter of our Navy, I am impressed with the level of detail included in the analysis of the alternatives. Current training for these aircraft has the overwhelming majority of training conducted from Ault Field, with not unexpected peak periods of use that result in delays to departing, arriving and aircraft conducting training. While NAS Whidbey Island does have capacity for additional operations, it will result in a increase in training and broaden the time aircraft operate from Ault Field during an average flight day with a resultant impact on the surrounding community. Regardless of whether additional aircraft are stationed at NAS Whidbey Island, it is both practical and environmentally responsible to mitigate the impact of training evolutions on Ault Field and the surrounding community by better utilization of a vastly underutilized OLF. One of many reasons OLF Coupeville experiences negative feedback is due to the infrequent and sporadic usage which subjects the surrounding community to dramatic changes. A more measured and consistent use of the field would benefit both communities and allow for the community, including the Navy, to settle into a better rhythm of operations that is predictable and responsible. More importantly this field provides the best training in preparation for shipboard operations and the projections in use today from the 2005 EA-18G Environmental Assessment did not adequately reflect the training need or current operational tempo. I recommend balancing the FCLP operations between the two fields to better utilize the training resources which will reduce the environmental impact to operations in the North Whidbey area with a moderate increase in operations in central Whidbey.

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.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 6.f. Fuel Dumping
- 7.h. San Juan Islands National Monument

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

**January, 2017 Comments**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

The health of my community is being drastically impacted by the Growler jets, which are deafening and rattle our houses as though we are experiencing an earthquake. It is frightening especially to young children – it feels like being in a war zone. I smell the fuel that is regularly dumped by the jets in the air pretty much most of the time.

Port Townsend, WA 98368

1. Navy media release indicates increase in number of flights without providing a specific number. Is the actual number of flights a secret? 2. The public input is a nice sideshow when we (you and us) know perfectly well that at the end of the day the EIS will somehow magically find the increase in flights is just fine.

1.a. Thank You

3.d. Arrivals and Departures

3.h. Runway Usage, Flight Tracks, and Altitudes

Coupeville, WA 98239

I am concerned that the Navy has not adequately researched the civilian impact Growler Expansion at OLF Coupeville. Just now we are learning that water wells have been seriously contaminated around the OLF. The Navy did not do their homework on firefighting chemicals and now residents are suffering the consequences – contaminated water wells. This is an example of how poor analysis on the part of the Navy can result in huge consequences for the community. Without sufficient noise measurements and impact analysis -- we won't know how the increased noise will impact wildlife or residents – until the damage has been done. Then it's too late. We all know that jet aircraft sometimes crash. When they do they can cause civilian casualties. This has not been addressed. Nobody wants to live near an airstrip with military jets making repeated full-power takeoffs. Residents near the Coupeville will suffer the increased noise while their property values plummet. Whidbey Island residents already pay a high price for pilot training at the OLF. That price will go through the roof with the dramatic increase in pilot training frequency. The Navy at least owes the residents more analysis. It is not responsible for the Navy to do a little light research and leave it up to Whidbey Island resident do to the "due diligence". Coupeville is not a Navy base and should not be treated as one.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.j. Property Values
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children



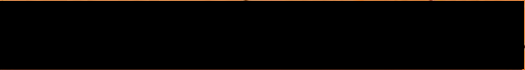


## Draft Environmental Impact Statement Comment Form EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

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)	<u>RESIDENT, CITIZEN, VETERAN MILITARY</u>
3.	Address	 <u>COUPEVILLE, WA</u>
4.	Email	

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

### Comments

Please check all that concern you and include 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 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.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 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.

Additional Concerns:

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

Please include any additional comments and concerns here:

AS A PARENT I DON'T UNDERSTAND WHY THE NAVY HAS NOT CONSIDERED THE LANDING FIELD AT FRIDAY HARBOR IT IS RIGHT ON THE WATER YOUR FINAL APPROACH IS RIGHT ON THE WATER & THE MAJORITY OF THE FLIGHT IS OVER WATER - THIS AREA WOULD ALSO BE LESS POPULATED MINIMIZING RISKS.  
THIS LOCATION CURRENTLY HAS CONTAMINATED THE AQUIFER SYSTEM TO THOUSANDS OF RESIDENTS & NEEDS TO BE CLEANED UP.

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, go to Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

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

1.a. Thank You

Chula Vista, CA 91913

The Outlying Field (OLF) at Coopville, Washington is essential to training aircrews in being proficient at short field operations. This paramount skill is required for SAFE world wide operations of the EA-18G Growler. In addition to enabling SAFE operations, this OLF should be preserved for continued operation for Pacific Northwest based aircraft. There are limited options for this critical effective training facility.



January 6, 2017

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

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

Dear Sir/Madam:

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

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

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

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

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

Sincerely,

[Redacted signature]

Name: [Redacted]

Address: [Redacted] *Port Angeles WA 98362*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 12. Add your own comments here:

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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

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

Comments

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

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

HAVE A MANDATORY ALTITUDE  
 FOR FLYING OVER SAN JUAN COUNTY.  
 I HAVE SEEN JET FLYING SO LOW →

(Continue on the back)

- 1.a. Thank You
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.e. Field Carrier Landing Practice Patterns
- 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



I CAN ALMOST SEE THE PILOTS IN  
THE COCKPITS.

ASSETAIN AT WHAT ALTITUDE NOISE  
BECOMES NON-FUNASIVE AT KEED

JETS ABOVE THIS FLIGHT DECK,

CURRENTLY THE FREQUENCY AND

VOLUME OF JET FLIGHTS OVER

THE SOUTH END OF LOPEZ IS

DEEPLY DISTURBING, INVASIVE AND

TROUBLING. IT AFFECTS THE

QUALITY OF MY LIFE AND THE

SURROUNDING ENVIRONMENT IN

A NEGATIVE WAY NEARLY

EVERY SINGLE DAY.



# Public Meeting Comment Form

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

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

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

1. Name [REDACTED]
2. Organization/Affiliation US CITIZEN ? HOMEOWNER
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

FIRST, I DO NOT APPROVE OF THE EXPANSION OF THE NUMBER OF GROWLERS. I BELIEVE THEY SHOULD BE PLACED IN SEVERAL DIFFERENT BASES.

SECOND, ANY INCREASE IN FLIGHTS WILL AFFECT THE TOURISM INDUSTRY THAT DRIVES THE ECONOMY OF THE ISLAND.

THIRD, THE QUALITY OF LIFE FOR CITIZENS, STUDENTS, FARMERS + ANIMALS IS SERIOUSLY HARMED BY THESE NOISE LEVELS.

FOURTH - THE STATED 65 DB IS NOT CREDIBLE, AND

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.h. Tourism
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric

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.

IS DISINGENUOUS. TO AVERAGE THE NOISE  
LEVELS OF THE FLIGHTS OVER A 24 HOUR  
PERIOD DOES NOT REPRESENT THE ACTUAL  
IMPACT THE JETS HAVE ON US.

PLEASE HEAR US!

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

Please print

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

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

**YOUR INPUT MATTERS**

Coupeville, WA 98239

I am against the proposed expansion of Growlers and their training flights at NAS Whidbey. I live in Central Whidbey and teach part time in Oak Harbor. Both of these areas are being impacted by the current Growler training. However, if the number of flights is increased five-fold, the impact will be devastating. I already have to suspend teaching when the jets are flying because the children cannot hear me. Therefore, we have two to three minutes when I can talk, and then up to a minute when I cannot....repeat, repeat, repeat. Very difficult. I am also very concerned about the potential for a crash, as the Growlers are flying over many residential areas. My small business is centered in Coupeville, and is dependent on tourism and the dollars that visitors bring to the Island. It is absolutely clear that tourism will fall off dramatically if the quiet, rural atmosphere of Central Whidbey is destroyed by increased Growler flights. In short, I do not in any way support an expansion. The current level of flights is manageable, but increasing them is not viable. Other Navy bases should be found that can host Growlers, rather than have ALL of them based here on Whidbey.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 2.k. Range of Alternatives
- 4.o. Classroom Learning Interference
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

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.

Greenbank, WA 98253

1.a. Thank You  
12.m. Education Impacts  
4.o. Classroom Learning Interference

Whidbey EIS With regard to adding additional portable buildings at the schools in the Oak Harbor School District due to the increase in personnel at NASWI here is some research which suggests that portable building can be detrimental to teaching and learning. Some of the research is on the detrimental health effects of using older portables: air conditioning units with mold, etc. However, a recent news item indicates that even with new buildings that some students feel isolated and feel they are relegated to a less status when they are assigned classes in a portable building.

<http://earthfix.info/news/article/overcrowded-underfunded-schools-turn-to-environment/> I would point to the very end of the article where both teacher and students complain about the psychological impact of being in a portable classroom. I have experienced similar problems when I taught in a portable building. Portables decrease the effects of community in a school. Community and cooperation are essential in today's educational environment. I also had a colleague who loved her portable classroom. She could avoid spontaneous conversations with other teachers, could "do her own thing" and could avoid her turn mentoring young teachers. This was not a good attitude in our world of collaboration. Here are some additional citations:

<http://www.savvyonseattle.com/blog/2015/10/4/public-school-overcrowding-portable-classroom-debate>

<http://www.opb.org/news/article/school-districts-explore-solutions-for-excessive-p/>

<http://digitalcommons.kennesaw.edu/facpubs/624/Do-Portable-Classrooms-Impact-Teaching-and-Learning> <http://eric.ed.gov/?q=portable+classrooms&ft=on&id=ED478178>

ERIC Number: ED478178 Record Type: RIE Publication Date: 2002-May-25 Pages: 20 Abstractor: N/A Reference Count: N/A ISBN: N/A ISSN: N/A The Acoustical Environment. Smith, Melissa Asserting that without an adequate acoustical environment, learning activities can be hindered, this paper reviews the literature on classroom acoustics, particularly noise, reverberation, signal-to-noise ratio, task performance, and recommendations for improvement. Through this review, the paper seeks to determine whether portable classrooms provide acoustically adequate environments for learning.

(Contains 63 references.) (EV) Sincerely [REDACTED]

Greenbank, WA 98253

1.a. Thank You  
12.n. Quality of Life  
4.r. Nonauditory Health Effects

The additional noise from 35 more Growlers will be painful for many people. Among them are people you will not hear from. There's [REDACTED] who is 98 and suffering from severe dementia. She is living in her home because she is physically able to get around. But she is easily frightened by loud noises. There is [REDACTED] husband who lives in Coupeville. Also trying to keep her husband at home while he is in the beginning stages of dementia. Again loud noises are incompatible with old and sick folks. There's also [REDACTED] who is nearly deaf and shows beginning signs of dementia living in Coupeville. He feels the tremor of the jets flying over. There are lots of elderly people who live in the area; some capable of writing; some not. But none want the serenity of their old age destroyed by jet noise. The people I listed above have all lived in the area since the 1970's long before the Growlers came into being. They deserve to live in peace at the end of their lives.



Greenbank, WA 98253

Growlers use the F-18 airframe; one of the most accident prone jets with a probability of accident at 67 times more than a commercial jet. How can you justify flying these jets with many takeoffs and landings and probably tired pilots over a residential area? Move your practice sessions to a more remote location.

1.a. Thank You

2.n. Alternatives Considered But Eliminated

5.a. Accident Potential Zones

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

Greenbank, WA 98253

The statement on A 145 page 148 the summary of non-auditory health effects does not mention the detrimental health effects of LFN (low frequency noise) Wikipedia states that Growlers have elevated LFN. See <http://www.windvigilance.com/about-adverse-health-effects/low-frequency-noise-infrasound-and-wind-turbines> <https://www.ncbi.nlm.nih.gov/pubmed/16201210> <http://www.lowfrequencyintrusion.com/?p=about> [http://www.medscape.com/viewarticle/554566\\_3](http://www.medscape.com/viewarticle/554566_3) The EIS should definitely include information and study of LFN.

1.a. Thank You

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

4.r. Nonauditory Health Effects

Greenbank, WA 98253

Aversion to LFN is an area to which the Navy gives very little attention or empathy. The EIS should contain information about the research on LFN.  
<http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;spage=59;epage=72;aulast=Leventhall>

- 1.a. Thank You
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.r. Nonauditory Health Effects

Greenbank, WA 98253

1.a. Thank You

5.a. Accident Potential Zones

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

The EIS for NASWI does not discuss crash frequency or the impact on the area surrounding the OLF should there be a crash. Just north of the OLF is a homeless shelter for youth and several businesses. A crash at this site would be devastating.

Greenbank, WA 98253

The EIS for NASWI does not adequately address economic concerns. There will be and has been a detrimental effect on tourism. There will be and has been an effect on home sales with a 9 percent loss in the area effected by flights now. There will be and has been a detrimental effect on the environment. Old research has been used to convince the residents of the positive economic impact of the Navy base. The old research comes from 1984. Since 1984 Greenbank, Freeland and Clinton have more than doubled in size with considerable more retail in those towns. It is unlikely that the Navy still contributes 85 % of the economy.

1.a. Thank You  
12.a. Socioeconomic Study Area  
12.h. Tourism  
12.j. Property Values

- 1.a. Thank You
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Feb. 17, 2017

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

The Navy has adopted standards that protect their personal 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 84dBA [Or 140dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

The health-damaging noise has invaded my own home throughout the day and into the late evening, winter, spring, summer and fall. This is the sound of the loudest warplanes in history, flying over island communities. This is noise at the deafening level known as the threshold of pain which can cause immediate ear damage.

I live 9.5 miles and a mountain —Mt. Erie—away from NAS Whidbey. I am in Skagit County on Fidalgo Island.

As I write this, the jets are flying. My house rattles and vibrates due to Growler events. Pictures on the wall and dishes in cupboards rattle. Wine glasses hanging in wine rack holders tinkle as if an earthquake is occurring. Again, I am almost 10 miles away—repeat, almost 10 miles away—from this public nuisance noise. I no longer have windows or door open at night or during the day. Open windows and doors only let the sound indoors. Even with closed windows and doors, dishes rattle, floors shake and glasses tinkle.

I am under the flight path. I didn't "buy at the end of a runway." The flight pattern has come to me. I am not collateral damage.

The Navy wants to ignore health studies and other evidence of the harm that noise vibrations can cause to the human body, including micro tears to internal organs.

This continued ignorance about Growler health harms, even before an EIS has been completed forewarns of a flawed and biased EIS.

Sincerely,

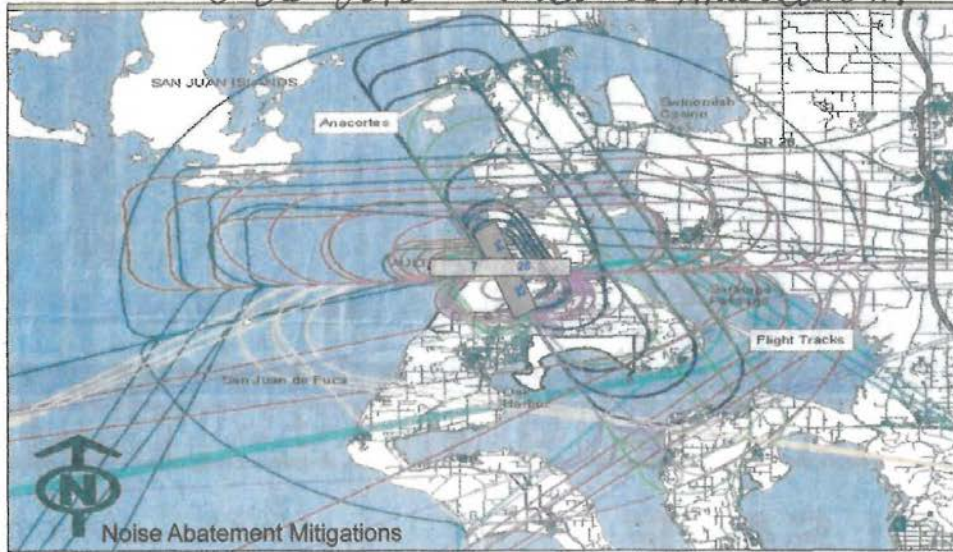


Anacortes, WA 98221

Attachment 1 flight path map

# Attachment 1 Flight Path Map

5-20-2015 Anacortes American 17



COURTESY NAVAL AIR STATION WHIDBEY ISLAND

The above graphic shows generally what Naval Air Station Whidbey Island flight patterns look like. The two boxes in the center show the direction of the four runways at Ault Field. Last year, runway 25 was the most used (48 percent of the time), followed by runway 14 (33 percent), runway 7 (13 percent) and runway 32 (6 percent).

- 1.a. Thank You
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests

Feb. 15, 2017

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

The DEIS selectively and reprehensively cites and then relies on out-of-date medical research findings on impacts of noise on human health. These findings are at odds with the overwhelming body of contemporary research, thus rendering the DEIS findings incomplete and dishonest. I demand an honest, complete forthright evaluation of the noise impacts on human health based on contemporary, formal medical literature.

Growler noise pollution and health impacts are an international problem, not only in neighboring Canada, but also in Japan.

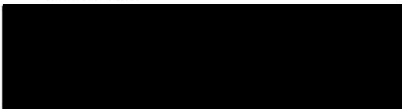
In May 2014, the residents living near Naval Air Facility Atsugi in Japan were paid \$70 million by their own government to mitigate the noise pollution and health impacts. The Japanese government then asked the U.S. to “pay their responsibility by taking seriously the fact that the Japanese court acknowledged the serious health hazards the noise has been inflicting on residents in the neighboring communities,” as reported in Stars and Stripes.

My tax dollars pay for the noise and health hazards of Japanese residents undergoing the same noise pollution and health impacts that I am enduring. This is outrageous!!!

The Navy must stop imposing serious health hazards on its own citizens of Puget Sound, the Salish Sea and the Olympic Peninsula.

Health harm from noise-induced vibration is real. These effects occur not only over Whidbey Naval Air Station and Whidbey Island, but also western Washington and all the islands between, the southern Gulf Island and in Victoria on Vancouver Island.

Sincerely,



Anacortes, WA 98221



Feb. 21, 2017

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

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 pollution. And, I would also add, CO2 carbon pollution.

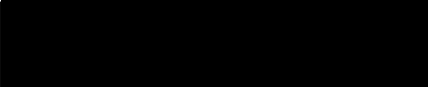
I am a gardener and I work outside in my home vegetable garden. I am, thus, affected by the Growler noise, carbon pollution and inhaling toxic fuel as it is spewed over Fidalgo Island and Anacortes. These pollutants settle onto water bodies and crops in my garden and in the nearby Skagit Valley. Pollutants also settle in bird baths and ponds.

According to the attached information, the average jet fuel and EA-18G Growler uses is 12.5 metric tons of CO2 per hour. One flight is about 23 percent more than the annual CO2 emissions of a Washington state citizen. One hour of a single EA-18G Growler flight is equal to driving a typical car 29,500 miles. A single EA-18G Growler flying overhead makes as much CO2 as 656 average US cars driving at 45 miles per hour.

This carbon pollution includes particulate matter, ozone and nitrogen oxides that aggravate heart disease, lung disease and other health problems.

Growler noise pollution and health impacts are an international problem in Japan and Canada, Puget Sound, the Salish Sea and the Olympic Peninsula. The Navy must consider the health of the people below the flight paths. We are not collateral damage.

Sincerely,



Anacortes, WA 98221

Attachement: 1

1.a. Thank You

13.a. Environmental Justice Impacts

18.a. Climate Change and Greenhouse Gases

18.b. Average Carbon Dioxide per Aircraft

18.d. Washington State Greenhouse Gas Goals

4.a. General Noise Modeling

4.r. Nonauditory Health Effects

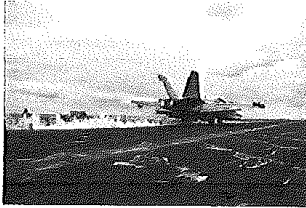
6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

Jan  
↑  
2015

## CO2 emissions from an EA-18G Growler

By citizensofthereserve

CO2 emissions from an EA-18G Growler



Ever wondered how much carbon dioxide is produced by one of those EA-18G Growlers Navy jets that have been roaring over Lopez? A friend asked me this question a couple days ago and I did the math. The results are shocking! (If you're interested in the details, I put the calculations and links to all sources here: <http://tiny.cc/growlerCO2>).

The average jet fuel consumption rate (based on typical operations patterns) of the EA-18G Growler is 1,304 gallons per hour. Combustion of jet fuel produces 9.57 kg CO2 per gallon. The CO2 produced is thus  $9.57 \text{ kg} * 1304 \text{ gal/hour} = 12479 \text{ kg/hour}$  or about 12.5 metric tons of CO2 per hour.

The per capita emissions in Washington state in 2011 was 10.18 metric tons per year (including all residential, commercial and industrial activities), so one hour of flight is about 23% more than the annual CO2 emissions of a typical Washington state citizen.

Another way of looking at it is to compare to CO2 emissions from a car. The typical passenger car found on US roads today (averaging old and new, inefficient and efficient) emits 0.423 kg CO2 per mile. Thus, one hour of a single EA-18G Growler flight is equivalent to driving a typical car 29,500 miles. That's five round trip road trips from Anacortes to New York City with a bit left over for sightseeing. It's also about an eighth of the distance between the earth and the moon. (In a Prius, you could do almost 13 round trips from Anacortes to New York City or a third of the distance to the moon).

Or, we could compare one of these airplanes flying overhead to the number of cars driving simultaneously that would produce CO2 at the same rate as a single Growler flying overhead. Let's imagine a fleet of average US passenger cars all driving the Lopez maximum speed of 45 mph. A car going 45 mph makes 19.0 kg per hour of CO2 ( $45 \text{ mph} * 0.423 \text{ kg CO2/mile}$ ). A single EA-18G Growler flying overhead makes as much CO2 as 656 average US cars driving at maximum speed on Lopez ( $12479/19.0$ ).

I'm upset about the increased noise of these jets, as are most folks I talk to. It turns out if you care about climate change, perhaps one of the most effective things you can do is encourage the Navy to get their soldiers out of the cockpit and into flight simulators (or better, encourage a demilitarized foreign policy). Please consider writing letters or calling Senators Murray, Cantwell, and Representative Rick Larsen.

Written by: Chris Greacen, PhD

You can leave comments by clicking [here](#), leave a [trackback](http://citizensofthereserve.com/blog/co2-emissions-from-an-ea-18g-growler/#comment) at <http://citizensofthereserve.com/blog/co2-emissions-from-an-ea-18g-growler/#comment> or subscribe to the RSS [Comments Feed](#) for this post.

Seattle, WA 98118

I'm a citizen and taxpayer, a resident of Seattle. I love the Olympic Peninsula with its beautiful Hoh Rain Forest and also Whidbey Island. I would like to see these serene areas remain natural and undeveloped. I am concerned about military activity in these areas and am writing to ask that there be none at all so that the plants and animals can live in peace and harmony as nature intended. Military war games and military planes should not be allowed in this vicinity. That's because it has been shown that in both humans and wildlife, effects from loud noise include hearing loss, increased stress hormones, cardiovascular disease, immune system compromise and behavioral/psychosocial impacts Thanks for considering my perspective. Regards, [REDACTED]

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 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

Oak Harbor, WA 98277

The plan to put 5 more squadrons at Whidbey Island seems totally excessive! We have limited water, limited housing, and the noise can be unbearable. Come over and try it! The White Paper (which I did not read totally) is comprehensive and the Navy cannot ignore it!

## 1.a. Thank You

Victoria, British Columbia V8T 2K9

I live in Victoria, British Columbia, about 5 miles to the north of Sir James Douglas School, one of the places where the noise collection was performed for the USN's EIS. I do not find the noise from Whidbey Island NAS troubling in the slightest. In fact, I can only assume that the rumbles that I hear on occasion, are coming from the NAS when the EA-18s are taking off or conducting full power tests/trials. I am certainly not awoken at night, nor is my speech indoors or outdoors impacted negatively when I hear the rumbles. Adding 20+ more aircraft to the NAS inventory seems to be a benign activity given the minimal noise impact from the 80+ jets already stationed there. In fact, when I do hear the jets' rumbles, it makes me feel good knowing our U.S. neighbours are protecting their democracy and freedoms - and those of my nation, for that matter too - by ensuring their military is well trained and equipped to do their jobs.

1.a. Thank You

**From:** [REDACTED]  
**Sent:** Friday, November 25, 2016 11:19 AM  
**To:** webmaster  
**Subject:** Environmental Impact Statement for the EA-18G Growler Airfield Operations Website

Good day,

Except for the USN's press release, all files and documents linked from the main page and the document page relating to the NAO are EIS are not coming up. The USN's server indicates this when trying to click on any file link:

## 500 - Internal server error.

There is a problem with the resource you are looking for, and it cannot be displayed.

Please fix this!

[REDACTED]  
Victoria, BC  
Canada

1.a. Thank You

Victoria, British Columbia V8S 5H2

As a resident of Oak Bay, living very close to the ocean and able to see clearly San Juan Island, I have no problem with the proposed increase in EA-18G Growler traffic. The sound of aircraft doing touch and goes is minimal and does not bother me at all. Canadians who value their liberty and security recognize the sound of the Growlers as the sound of freedom.



# Public Meeting Comment Form

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

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

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

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

I found the Navy doesn't care about our quality of life. We can no longer watch our grand child due to the noise levels or even have a conversation in our own homes. We're trapped in our own homes. The Navy should buy us out.

I no longer trust the Navy @ANIS. It's so bad we put our house on the market. We have to take a

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.k. Compensation to Citizens for Private Property
- 12.n. Quality of Life
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.r. Nonauditory Health Effects

LOSS  
It's horrible





# 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 Local Residents
- 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

There are many concerns about the current level of noise produced by the Growlers flying over our community - certainly inconvenience - but also effects on hearing, cognitive performance, anxiety - which I understand have been scientifically documented. As a pediatrician, I have particular concerns about effects on the developing nervous systems of our children. Increasing the number of flights over residential areas is not acceptable. There are also significant

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.m. Impacts to Marine Species and Habitat
- 2.e. Public Involvement Process
- 2.n. Alternatives Considered But Eliminated
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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.

Concerns about effects on wildlife  
including Osprey

As I recognize significant expense would be involved I think the growler facility should be moved to a location which is less populated.

I would have preferred a community forum with a presentation & the opportunity to hear questions & answers from all attendants.

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

Please print

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

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

**YOUR INPUT MATTERS**

Coupeville, WA 98239

I feel the EIS-for EA-18G operations did not cover the economic concerns that we all have. I own a store in downtown Coupeville. I already have felt the economic hardship from having very loud planes flying over head. Several costumers were shocked and frightened by the noise in their nightly rental homes.They stated they will never come back. I am also concerned about property values. We have had our home for 25 years. We are in the flight pattern. As we look to retirement our house due to the impact of the new Growlers coming is un salable.

1.a. Thank You  
12.f. Economic Hardship and Impacts  
12.h. Tourism  
12.j. Property Values

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.h. Next Steps
- 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 *homeowner - S. end of Lopez Island*

4. City, State, ZIP *Lopez Island, WA. 98267*

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

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

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

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

**January, 2017 Comments**

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

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

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

*I agree with the requests that have been made. Thank you for completing this project.*

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Whidbey Island, WA 98239

1.a. Thank You  
12.j. Property Values

This draft is flawed in that it does not address economic hardships imposed upon property owners due to falling property values as a result of noise generated by training flights. This in turn will eventually lead to lower property tax revenues received by Island County to fund services.

Whidbey Island, WA 98239

1.a. Thank You

4.a. General Noise Modeling

The modeled noise exposure is flawed because it excludes the 900 inter facility Growler Operations (FCLP-related) noted as footnote 4 of the Appendix tables. This represents nearly 15% of the current noise exposure. Why was it not included?



Whidbey Island, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives

Why didn't the study include alternative sites in measuring environmental impacts of the area?

Whidbey Island, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives

Why wasn't an alternative of fewer, or no flights, at OLF included as a way to reduce impacts?

Whidbey Island, WA 98239

1.a. Thank You

4.f. Noise Measurements/Modeling/On-Site Validation

This study is flawed in that it did not include actual sound measurements at the locations to verify computer modeled sound levels. You are fully aware of the discrepancy between ground-level sound measurements taken by a private firm and the sound measurements generated by modeling only. Why was this not done?

Island County, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

Island County, 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.

Island County, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

Island County, 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 or suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Island County, WA 98239

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo



1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Island County, 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 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.

Island County, 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.

Island County, WA 98239

The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs 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

Island County, WA 98239

1.a. Thank You  
7.c. Noise Disclosure

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Island County, 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).

Island County, 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.

Island County, WA 98239

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts.

Island County, WA 98239

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports



Island County, 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.

Island County, 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

of occurrences. Thank you!



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learning opportunities for outdoor activities, including outdoor learning opportunities for school children have been negatively impacted / disrupted on a number

1. Name [REDACTED]

2. Organization/Affiliation Resident / school teacher

3. Address [REDACTED] P.T. 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

how about email?  
- save resources ;)

My concerns about increased Growler operations:

① They frighten residents (children) and animals.

② They contribute to a stressful, terrorizing, unlivable environment.

③ They negatively impact tourism.

④ They disrupt outdoor activities.

⑤ My dogs panic when they hear the planes, add to stress in the household.

I fear n. foreseen negative impact to wildlife we are not yet aware of.

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**

⑤ They drive people indoors because of constant noise

my

1.a. Thank You

Clinton, WA 98236

I live in Clinton on Whidbey Island, Washington - we are very proud to have NAS Whidbey on Whidbey Island. It makes me so proud, PROUD, to see and hear the training jets when they fly over my home on the south end! When possible, I go out on my deck and wave to them. I know they can't see me but I just feel the need to cheer them on. God bless you for protecting and preserving our United States of America.

Coupeville, WA 98239

As a parent, grandparent, and wife of a veteran who taught in both Coupeville and Oak Harbor, I see the only options provided in the draft EIS are whether to sacrifice the children of the Oak Harbor area or the children of Coupeville--their hearing, cognitive development, and lives when an accident occurs or when an enemy finds that having all Growlers based in one vulnerable location makes that island an ideal ground zero. The no-action alternative should be explored as a viable alternative.

- 1.a. Thank You
- 2.I. No Action Alternative
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.d. Environmental Health Risks and Safety Risks to Children

Coupeville, WA 98239

1.a. Thank You  
12.e. Agriculture Analysis  
5.a. Accident Potential Zones

Like many Coupeville residents and tourists, I shop at the Coupeville Farmers Market on Saturdays on the community green. I have two concerns related to our shopping experience. One is that at some level of OLFC flights, flights would occur on Saturdays, making the shopping experience unpleasant and possibly painful. The second is that if our local farmers are unable to work their fields due to noise and/or accident potential, there would be no produce to sell and, therefore, no market or source of fresh local produce.

Coupeville, WA 98239

1.a. Thank You  
12.i. Housing Access and Affordability  
12.m. Education Impacts

Affordable housing on Whidbey Island is in extremely short supply. The draft EIS lists numbers of Navy personnel and dependents that will be added, but does not appear to consider the additional community support workers that must be added as well. Where are these Navy personnel going to live? Will the Navy provide housing? Or will many need to live off the island and commute on a two-lane bridge that is already at high capacity? What additional help will the Navy provide to the school districts to build additional schools and/or classrooms and improve sound insulation?

Coupeville, WA 98239

1.a. Thank You  
4.I. Points of Interest

Please include Coupeville Middle and High School, outdoor education both there and at Coupeville Elementary School, Rhododendron Park playfields, WhidbeyHealth Hospital, and CareAge of Whidbey in your noise and accident modelling. And please use modelling techniques that are actually relevant to touch-and-go flights.



Bellevue, WA 98008

I am opposed to training flights over national park, wilderness, and tribal lands on the Olympic Peninsula. Parks, wilderness and tribal lands should be left naturally quite and serene at all times. The proposed training intrusions are unacceptable.

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

Coupeville, WA 98239

Living on an island in Puget Sound which, in case of an earthquake, will have a difficult time getting on and off the island, if this Navy proposal is finalized, will add man personnel to handle all of the infrastructure. With today's news about the North Koreans having stockpiled nerve gas, dirty bombs etc, what will stop them from sending interballistic missiles our way since we will be housing the ENTIRE fleet of EA-18G Growlers? It seems that building one less jet we could build quite a few landing strips shaped like carriers in more remote areas (east of the Cascades?) where there is less population. This seems like a true idiotic proposal where one or more bombs could wipe out an entire fleet.

1.a. Thank You

1.e. Risk of Terrorist Attack

16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)

2.n. Alternatives Considered But Eliminated

Environmental Impact Statement Comment Form  
EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

1. Name [redacted]  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
Resident, Citizen, Veteran, retired school teacher  
3. Address [redacted] Coupeville, WA 98239  
4. Email [redacted]

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Comments

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):

- X Health effects from noise and low-frequency sound.
- X Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- X 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.
- X A decrease in private property values due to noise.
- X Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- X Noise impacts on commercial properties including agriculture.
- X Aquafer and well contamination.

Additional Concerns:

(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.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.a. General Noise Modeling
- 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

- X The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- X 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.
- X The impact on marine and terrestrial wildlife.
- X The major security risk for Whidbey Island by siting all Growlers here.
- X Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I am a retired public school Music Teacher and Musician. My wife and I have lived here in Central Whidbey for over 40 years. Parts of my family lived here before NAS arrived in the early '40's.

The original effect on Whidbey Island was minimal compared to what is projected for the future. Back in the 40's it was a very peaceful place to live. Even when the PBV's arrived, Oak Harbor welcomed the Navy and their prop planes as a way to support our war efforts. These prop planes were quiet compared to what is around today, and they basically took off and landed when necessary. There was none of this touch-and-go stuff in the middle of the night for hours on end.

The expectation was the Navy would depart after the war ended. In fact, the Navy also had assumed they would be leaving, but changed their minds in 1946 after the war was over. The Outlying Field (OLF) wasn't even a part of NAS Whidbey. It was part of the Sand Point NAS which is now closed.

We in Central Whidbey share this wonderful community with many active and retired Navy personnel. They are friends and neighbors. Our beef is not with Navy personnel. It's with the decision-making which occurs as far up as the Pentagon. I know many Navy friends who also are upset with the decisions made in D.C.

Why doesn't the Navy still use bases which used the older and quieter Prowlers to do touch-and-go in other areas of the country? (California, Florida and Nevada, for example) Why is the State of Washington (especially the Puget Sound Region) the center for so many military bases?

Hearing about relations deteriorating with China, Iran and North Korea, isn't it possible that, if interballistic missiles were used in the future, the Puget Sound region, with all its military bases, would be a prime target?

My suggestion would be to close OLF and no increase the number of Growlers practicing in the Oak Harbor area. Let's find an area much less populated than Whidbey Island to do these exercises.

Let's bring back peace and quiet to beautiful Whidbey Island.

Coupeville, WA 98239

I am a retired elementary music teacher having taught my last 20 plus years in Coupeville and Oak Harbor, Washington. In the 70's and early 80's I taught in Coupeville. At that time there was very little touch and go happening at OLF, and the aircraft was the EA-6B Prowler. There was also very little flying at OLF during the school day. Even then (being in a portable), I would have to stop teaching when the jets flew overhead. In most of the 80's and 90's I taught at [REDACTED] in Oak Harbor, again in a portable. There was much more flying going on up north, and, having very little insulation in the music portable, I would have to wait for the jets to finish flying overhead before we could continue with a music lesson. And today the quieter Prowler has been replaced by the much more obnoxious E-18 Growler. Not only is it much louder but the plans call for exponentially increasing the numbers from 57 to 160. This should greatly affect student learning on our north end of the island. Reading in the latest News Times that a Washington State Department of Health report that analyzed existing studies contradicted the Navy's claim that there is no link between military jet noise and health, I wonder if many students in Central and North Whidbey schools could be and have hearing loss due to all the jet noise. The report also found evidence that the military jet noise can affect children's cognitive abilities. Instead of calling the noise "the Sound of Freedom", maybe we should refer to the noise as "being a threat to public health". Instead of unloading all this Growler noise, let's spread it around the country to the bases previously used by Prowlers.

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

1.a. Thank You  
4.r. Nonauditory Health Effects

EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attention: Code EV21/SS

Dear Project Manager,

I am an active voter of 37 years, living on the Quimper Peninsula, Middlepoint area; 17 miles as the crow flies, from Naval Air Station Whidbey Island.

27 years at this peaceful location, then 3 years ago I started living with earplugs from the continued bombardment of Navy Growlers flying over my home. You can hear this ridiculously loud military war plane approaching from ten miles away transiting our once quiet neighborhood. My sanity along with thousands of local citizens are being destroyed.

I ask you to stop the rolling thunder falling from our skies from the U.S. Navy Growlers.

We, the community, are the collateral damage of the U.S. Navy Weapon System.

This is not a way of life at all, in any true sense;  
it is "humanity hanging a cross of iron!"  
(Dwight D. Eisenhower)

The alternatives proposed in the Navy DEIS are "Not Ok".

  
  
Port Townsend WA 98368

1.a. Thank You

4.r. Nonauditory Health Effects

Port Townsend, WA 98368

EA-18G Growler EIS Project Manager Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard Norfolk, VA 23508 Attention: Code EV21/SS Dear Project  
Manager, I am an active voter of 37 years, living on the Quimper Peninsula, Middlepoint  
area; 17 miles as the crow flies, from Naval Air Station Whidbey Island. 27 years at this  
peaceful location, then 3 years ago I started living with earplugs from the continued  
bombardment of Navy Growlers flying over my home. You can hear this ridiculously loud  
military war plane approaching from ten miles away transiting our once quiet  
neighborhood. My sanity along with thousands of local citizens are being destroyed. . I  
ask you to stop the rolling thunder falling from our skies from the U.S. Navy Growlers.  
We, the community, are the collateral damage of the U.S. Navy Weapon System. This is  
not a way of life at all, in any true sense; it is "humanity hanging a cross of iron"! (Dwight  
D. Eisenhower) The alternatives proposed in the Navy DEIS are "Not Ok". [REDACTED]

[REDACTED] Port Townsend WA 98368

**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](http://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)

*Nearly under the flight plan in Crockett Lake Estate*

3. Address [REDACTED] *COUPEVILLE WA 98239*

4. Email \_\_\_\_\_

5. Phone [REDACTED]

6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeveis](http://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.**

**Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.

**The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

(over)

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 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.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.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.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones



- The Navy did not adequately look at siting new Growler aircraft elsewhere, despite this being the #1 request from the community during the Navy's prior scoping forums.
- An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.
- Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries. All active electronic warfare jets in the US Military would be at NASWI.
- The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia, with over 100 incidents in all F/A-18 airframes in 2015 alone. Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Please include any additional comments here:

*The future seems to be drones. Why increase the number of manned aircraft.*

*Increasing the number of aircraft assigned to Whidbey will result in an increase in the use of OLF, resulting in more dangerous noise for us residents plus the greater possibility of a crash.*

*I don't expect a Navy impact report will show any problems, relative to the welfare of us residents, if such a study is ever conducted.*

### What else you can do

1. **Get involved.** To volunteer, email us: [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
  - a. U.S. Senator Patty Murray: 206.553.5545; [www.murray.senate.gov](http://www.murray.senate.gov)
  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

### To Learn More

- ✓ To receive email updates, or to get involved, **email us** at [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at [www.whidbeyeis.com](http://www.whidbeyeis.com)

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

1.a. Thank You

Burien, WA 98166

Don't need the noise.

## 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](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
- 6.f. Fuel Dumping
- 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](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 affected neighbor
- 3. Address [REDACTED] Poppy Ave 98261
- 4. E-mail N/A
- 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](http://www.QuietSkies.info)

- 1. Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).
- 2. Recognize the impacts of low frequency Growler noise on health.
- 3. Incorporate San Juan County noise reports in the EIS analysis.
- 4. Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.
- 5. Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.
- 6. Commit to Mitigation Measures and timelines in the Record of Decision.
- 7. Add your own comments here:

Build a hush house for engine testing  
stop dumping fuel on our pasture &  
woodlands.

(Continue on the back)

Oak Harbor, WA 98277

Comparing the training and operational needs of the Navy on Whidbey Island with those of local residents feels lopsided. How do you argue with "the Sound of Freedom"? I would like to raise my voice nonetheless and say that the noise created by the Growlers is already highly disruptive to daily life and an increase in flights and activities will have an extremely negative impact on residents. I teach locally and at two of our schools lessons are interrupted repeatedly each day by flyovers. It's not just plugging ears for a few minutes, but a loss of attention, a loss of a teachable moment, and the resultant loss of time while you rebuild to where you were. Some days interruptions are so frequent we might as well have stayed home. At the other schools the flyovers are less frequent, but still irritating. While the jets are overhead all action stops. No matter where you are and what you are engaged in conversation, work, exercise, everything stops. It's like having repeated earthquake drills. Stop, duck and cover. We stop, cover our ears and wait. I don't know how to quantify the discomfort and disruption other than to say it is already excessive and any increase will surely be unbearable. What do I recommend? Ideally a second location to share the duties of this base. Yes, this would be expensive and take time to build. But that would be my preference. Saturation of this area with this noise will erode our community. Can't the new Growlers be based elsewhere? I cringe to think of living with more of them.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance



Coupeville, WA 98239

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

12. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain or suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Coupeville, WA 98239

As a retired teacher of the Coupeville School District, I have observed and dealt with students who have been impacted by a lack of sleep due to late night flights at the OLF and it's impact on their learning. 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.

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

10. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact that must be addressed and the public must be given the opportunity to comment.

Coupeville, WA 98239

11. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo

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

13.a. Environmental Justice Impacts

9.Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Coupeville, WA 98239

1.a. Thank You

4.q. Potential Hearing Loss

6. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month").

Coupeville, WA 98239

1.a. Thank You  
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

4.q. Potential Hearing Loss

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.

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.

Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

1.The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Coupeville, WA 98239

1.a. Thank You  
4.j. Other Reports

4. The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.

Coupeville, WA 98239

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.

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 than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

Coupeville, WA 98239

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

3. The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.





- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields. *Home yard*
- 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:**

If I am caught outside when an F-18 approaches my ears begin to ache. I immediately move inside my house with all the windows and doors closed. My ear continue to ache for 2 more hours after the flying stops. This is a health hazard.  
Other health hazards are loss of sleep from night flying and extreme anxiety.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

February 10, 2017

EA-18G EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

Dear Sir:

This regards the Growler RPM and EIS for increased F18 flying over Central Whidbey Island. I live at [REDACTED], in the landing approach to OLF. I understand for the EIS the Navy used modeling of noise data rather than actual data to analyze the impact. This does not accurately measure the noise at my home. How about measuring actual landing noise over my home? It has to be a health hazard.

Here are some of the impacts of the current level of flying over my house. If outside when an F18 approaches, immediately I stop my outdoor activity, go inside and close all the windows and doors. My ears ache during the flying and for one to two hours after the flying stops.

Many other quality of life and health issues are also significant:

- a. F18 flyovers are significantly noisier than A6s.
- b. Walls shake and windows rattle.
- c. We can't use the phone or talk to anyone in the house.
- d. We cannot hear the TV, radio, any music options.
- e. It is difficult to concentrate.
- f. I get anxious and very uncomfortable.
- g. I loose sleep because of night flyovers
- h.

Because of these current health and quality of life issues, I am totally opposed to increased flying at OLF. Increased flying would undoubtedly cause me and my family even more harm.

Respectfully,

[REDACTED]

Coupeville, WA 98239  
408 218 8801

- 1.a. Thank You
- 12.n. Quality of Life
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.m. Supplemental Metrics
- 4.r. Nonauditory Health Effects

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February 10, 2017

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Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

Dear Sir:

This regards the Growler RPM and EIS for increased F18 flying over Central Whidbey Island. I live at 181 Keystone Avenue, in the landing approach to OLF. I understand for the EIS the Navy used modeling of noise data rather than actual data to analyze the impact. This does not accurately measure the noise at my home. I would appreciate your obtaining and using actual noise level measurements.

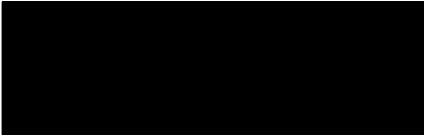

Here are some of the impacts of the current level of flying over my house. If outside when an F18 approaches, I immediately get a migraine headache which lasts for hours. I must also immediately stop my outdoor activity, go inside and close all the windows and doors. Even inside when flying occurs, I often get a headache which lasts some time.

Many other quality of life and health issues are also significant:

- a. F18 flyovers are significantly noisier than A6s.
- b. Walls shake and windows rattle.
- c. We can't use the phone or talk to anyone in the house.
- d. We cannot hear the TV, radio, any music options.
- e. It is difficult to concentrate.
- f. I have difficulty falling asleep, with night flying.

Because of these current health and quality of life issues, I am totally opposed to increased flying at OLF. Increased flying would undoubtedly cause me and my family even more harm.

Respectfully,

  
Coupeville, WA 98239  






- 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.
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**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.

1.a. Thank You

Coupeville, WA 98239

I believe that the Navy program to increase the mission and number of aircraft on Whidbey Island are very necessary and needed. The OLF program is particularly required to insure Navy aviators receive the necessary training for carrier landings. We have the EA=18G aircraft flying over our heads and believe this is required to insure our safety. Thank you NAVY for keeping us safe.

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](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation farmer/self

3. Address [REDACTED] Port Townsend 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

We do not need these killing machines flying over us disturbing the little peace we have. The helicopters over our farms in the day & growlers all night long are not there for our protection. The military has become a mercenary army for corporate interests - you are not making us safer - you are making more & more enemies. You are presently using these killing machines to bomb 7 countries. The US military has been stolen by mercenary interests - Stop flying over us!

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

Langley, WA 98260

Until recently, my partner and I were looking to buy a home in and move to Coupeville. The thought of constant jet noise is irreconcilable. We are no longer considering Coupeville as a place we would like to live, and will be searching for a home elsewhere.



Langley, WA 98260

1.a. Thank You

4.r. Nonauditory Health Effects

I previously worked for a business that was located near OLF and I recall a specific day when the noise from the Growlers was so severe that I had to leave work because I began to feel extremely nauseas. At this time I am not advocating for closing OLF, however I think it is very irresponsible to be increasing the number of Growlers and thus the frequency with which community members will be negatively impacted. Having experienced this first-hand I still cannot imagine how terrible it would be to live with this everyday. Although we have many friends who live in Coupeville, this experience has made my husband and I decide that we will not move to Coupeville. Expanding the Growler operations will inevitable seriously harm the community of Coupeville and those who care about this community.

## 1.a. Thank You

Oak Harbor, WA 98277

I am a homeowner who lives under the airport pattern for Ault Field. EA-18G Growlers and other Navy aircraft fly over my house on a routine basis for qualification and other flights, often lasting well into the night. These activities were clearly identified to us when we purchased our property, cause us no discernible health problems, and appear to have no adverse effect to our pets nor the livestock in surrounding fields. Our experience is that Growlers produce less noise than their predecessor, the Prowler. Documents we signed when we bought our house promised flights of military aircraft over our house. We consider it something of a contractual promise.

1.a. Thank You

Port Angeles, WA 98363

I would like to thank the Navy and all the armed forces for all you do. I feel you should train over the Olympic Penninsula in any way you need to. The American people are lucky to have all of you protecting us, so do what ever you need to. Thank you.

1.a. Thank You

10.c. Wildlife Sensory Disturbance and Habituation

Victoria, British Columbia V9B6G8

From early morning until dark we hear the Growler jers from Whitbey. Our summer into autumn is disturbed by what sounds like rolling thunder. It is awful. I live 30 mins from downtown Victoria in a community called the District of Highlands. I can't help but wonder about bird populations, nesting birds, etc and the damage from this near constant noise pollution.

Victoria, British Columbia V9B6G8

As a resident of the District of Highlamds, a community 30 mins north of Victoria , I am deeply concerned and affected by the near constant noise of the Growler jets from Whidbey. This past summer with the addition of more jets was terrible and now I understand more jets and practise flights will be added. I am an unimpressed Canadian neighbour and deeply worried about the effect on the environment especially the stress of noise pollution on nesting birds, whales swimming, all marine and human life.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Victoria, British Columbia V9B6G8

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- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Port Ludlow, WA 98365

My parents both served in the military. The Olympic Peninsula is a heritage site and protected area which it should remain- free from military war games and practice. The pollution and noise is not necessary- you have use of other practice sites that are already reserved for these exercises. I grew up in a town with an air force base near by- when a jet went over our school all teaching stopped until the disruption was over. This wasn't an option it was necessary. The Olympic Peninsula should be viewed as a protected place free from encumbrances that diminish the beauty, quiet, and enjoyment of nature. The world is in turmoil and chaos- why bring that in force to a treasured area. Growler missions, noise, pollution, loss of tourism dollars - redirect your goals to be accomplished in areas more suitable to your vision. If the future wars are waged with nuclear weapons - the growlers and weaponry will be obsolete anyway. Thank you for your consideration.  
Sincerely, [REDACTED]

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