1 Purpose of and Need for the Proposed Action

This chapter provides background information related to the Proposed Action and describes the purpose of and need for the Proposed Action. It also describes the National Environmental Policy Act (NEPA) process, public involvement, and how the Environmental Impact Statement (EIS) was developed and organized.

1.1 Introduction

The United States (U.S.) Department of the Navy (Navy), beginning as early as 2017, proposes to:

- continue and expand existing EA-18G "Growler" operations at the Naval Air Station (NAS) Whidbey Island complex, which includes field carrier landing practice (FCLP) by Growler aircraft that occurs at Ault Field and Outlying Landing Field (OLF) Coupeville
- increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded U.S. Department of Defense (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

In addition, the Navy would continue to support all flight operations of other aircraft at the NAS Whidbey Island complex. This EIS evaluates the potential direct, indirect, and cumulative environmental impacts of the Proposed Action under three action alternatives (further described in Section 2.3, Alternatives Carried Forward for Analysis). After completion of the EIS process and issuance of a Record of Decision (ROD), construction of new and improved facilities could begin as early as 2017. Personnel and aircraft would arrive incrementally, as aircraft are delivered by the manufacturer, personnel are trained, and families relocate to the area, until the action is complete.

The Navy has prepared this EIS in accordance with NEPA, as implemented by the Council on Environmental Quality (CEQ) regulations and Navy regulations for implementing NEPA.

1.2 Location

The NAS Whidbey Island complex is located in Island County, Washington, on Whidbey Island, in the northern Puget Sound region (Figure 1.2-1). The NAS Whidbey Island complex includes the main air station (Ault Field), OLF Coupeville, the Seaplane Base, and Lake Hancock. Ault Field is located in the north-central part of the island, adjacent to the City of Oak Harbor (Figure 1.2-2). OLF Coupeville is located approximately 10 miles south of Ault Field (Figure 1.2-3) and is used primarily for FCLP. The Seaplane Base is within the city limits of Oak Harbor and is the primary support facility for NAS Whidbey Island complex, including Navy housing, the Navy Exchange and Commissary, and administration/ communications facilities. The Seaplane Base is included in this analysis because it contains housing and support facilities, which would be used by personnel and their dependents. Lake Hancock is a 423-acre site near Greenbank, Washington, that was previously used for aerial bombing training between 1943 and 1971. Lake Hancock Training Range was listed as closed for aerial bombing training in 2002. Today, the site is managed by the Navy and The Nature Conservancy as a wetlands marsh. This area is still underneath restricted airspace, and a portion of the site is currently being used by the military to monitor training in Admiralty Bay and for other military training exercises. The Proposed Action would not impact resources at Lake Hancock; therefore, Lake Hancock will not be discussed further in this analysis.

Figure 1.2-1 General Location Map – NAS Whidbey Island Complex

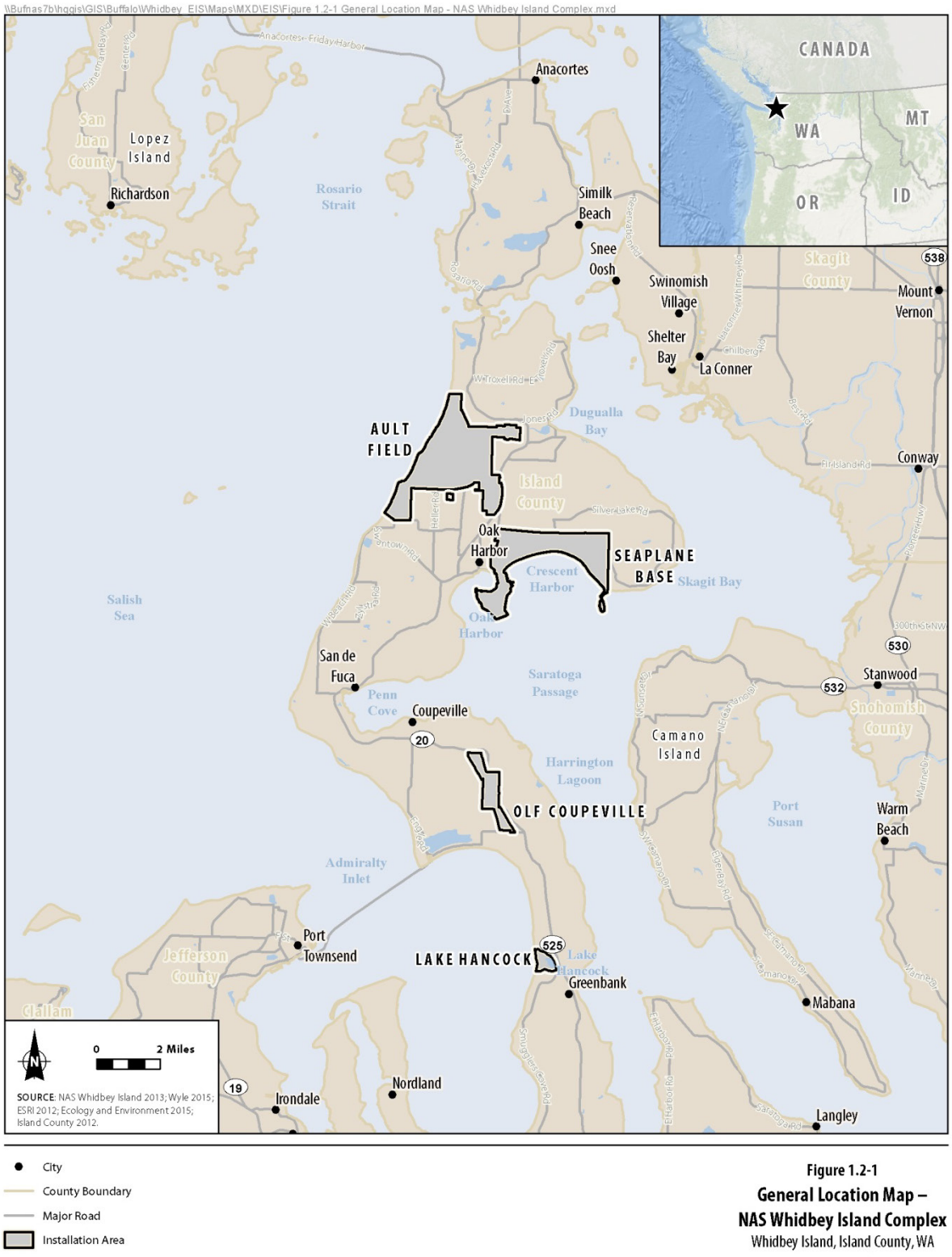


Figure 1.2-2 General Location Map, Aerial, Ault Field

Figure 1.2-3 General Location Map, Aerial – OLF Coupeville

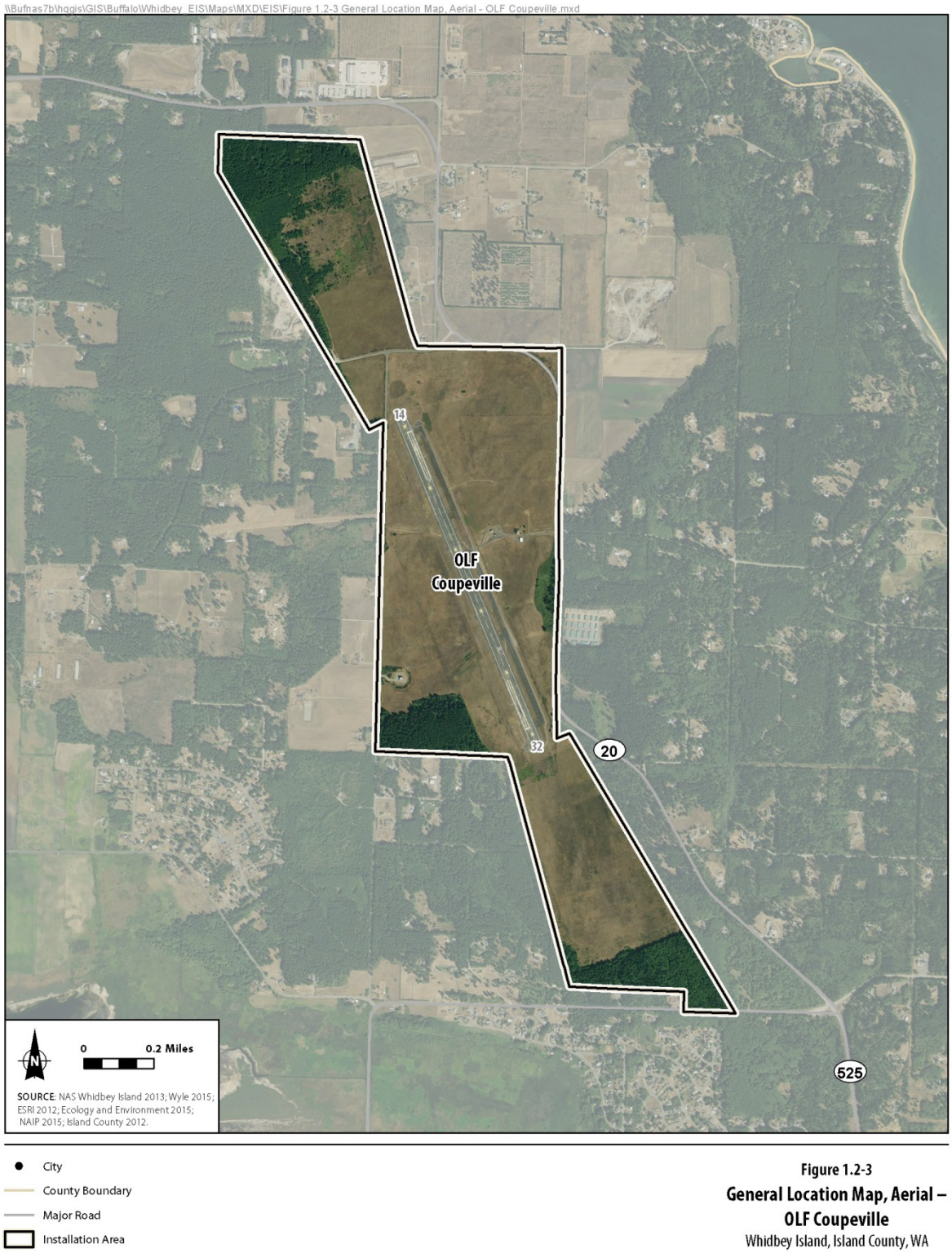


Figure 1.2-3
General Location Map, Aerial – OLF Coupeville
Whidbey Island, Island County, WA

1.3 Purpose of and Need for the Proposed Action

> 10 U.S.C. Section 5062: "The Navy shall be organized, trained, and equipped primarily for prompt and sustained combat incident to operations at sea. It is responsible for the preparation of Naval forces necessary for the effective prosecution of war except as otherwise assigned and, in accordance with integrated joint mobilization plans, for the expansion of the peacetime components of the Navy to meet the needs of war."

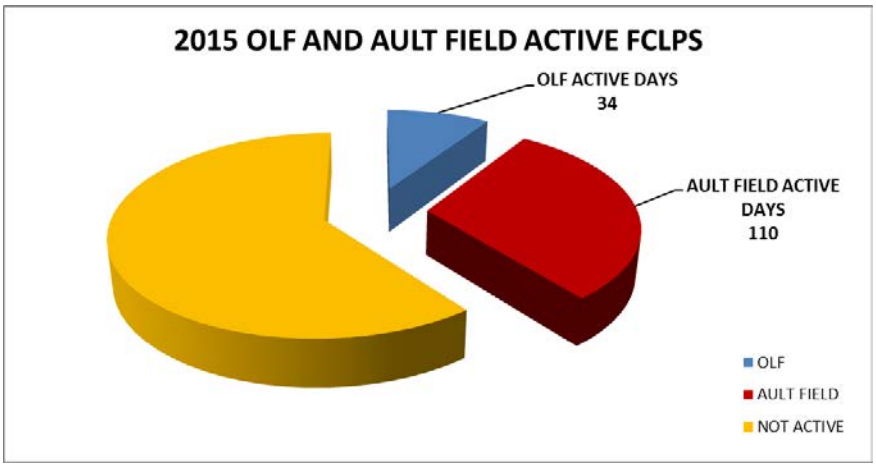
The purpose of the Proposed Action is to augment the Navy's existing Electronic Attack community at NAS Whidbey Island by operating additional Growler aircraft as appropriated by Congress. The Navy needs to effectively and efficiently increase electronic attack capabilities in order to counter increasingly sophisticated threats and provide more aircraft per squadron in order to give operational commanders more flexibility in addressing future threats and missions. The need for the Proposed Action is to maintain and expand Growler operational readiness to support national defense requirements under Title 10, United States Code (U.S.C.), Section 5062.

1.4 The Navy's Electronic Attack Community at Ault Field and OLF Coupeville

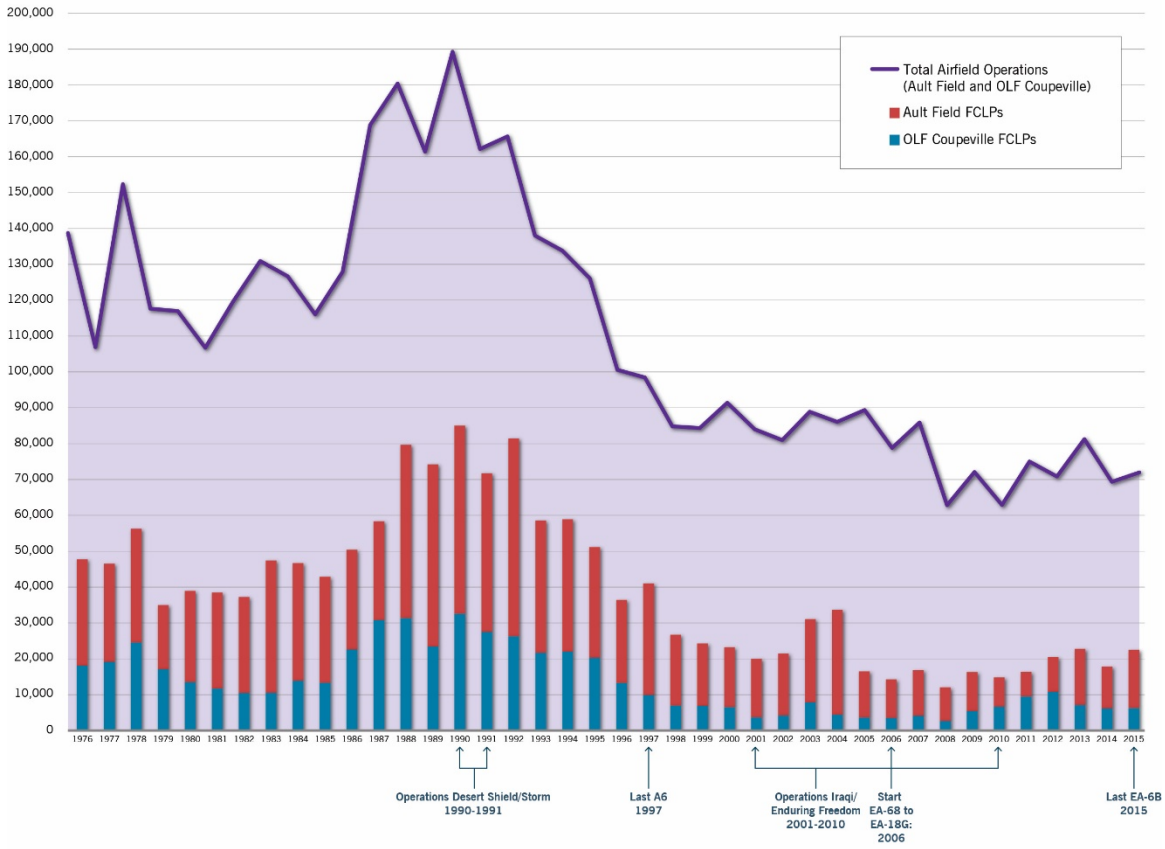
Commissioned in 1942 as part of NAS Whidbey Island, Ault Field is the only Naval air station in the Pacific Northwest. It has supported Naval aviation for more than 70 years and served as the primary home base location for the Navy's Electronic Warfare community for more than 45 years. Ault Field and the Seaplane Base were identified as ideal locations for the rearming and refueling of Navy patrol planes and other tactical aircraft operating in defense of Puget Sound during World War II; OLF Coupeville became operational in 1943 to support practice approach/landings and emergency landings. Over a period of more than 40 years, Ault Field has evolved into the Navy's home for its Electronic Attack aircraft. OLF Coupeville, an integral part of operations at Ault Field, provides the most realistic training for FCLP, as well as training for search-and-rescue and parachute operations.

> **FCLP (field carrier landing practice)** is a graded flight exercise that prepares pilots for landing on aircraft carriers. FCLPs are conducted on shore facilities to provide pilots the opportunity to simulate carrier landing operations in an environment where the risks associated with at-sea carrier operations can be safely managed. Landing on an aircraft carrier is one of the most dangerous tasks a pilot can perform, and is a perishable skill.
>
> A typical FCLP evolution lasts approximately 45 minutes, usually with three to five aircraft participating in the training. FCLP schedules are dictated by training and deployment schedules, occur with concentrated periods of high-tempo operations, and are followed by periods of little to no activity.
>
> Per Navy guidelines, pilots must perform FCLP before initial carrier qualification (ship) landings or re-qualification landings. The first carrier landing needs to occur within 10 days of completion of FCLP.

Since the late 1960s, the Navy has continuously used OLF Coupeville for FCLP. Previous flight operations data for both Ault Field and OLF Coupeville indicate periods of higher and lower activity, depending on Navy mission requirements. The following graph represents approximate and best available aircraft operations data for Ault Field and OLF Coupeville as recorded through tracking methods at the time.



Previous Airfield Operations for Ault Field and OLF Coupeville



Ault Field is the home base location of the Navy's entire tactical Electronic Attack community in the U.S., including all Growler squadrons, and provides facilities and support services for nine carrier squadrons, three expeditionary squadrons, one expeditionary reserve squadron, one training squadron, and an Electronic Attack Weapons School. The carrier and expeditionary squadrons have similar missions but differ in where they deploy and how they train before deployment.

Three types of Growler squadrons support the Airborne Electronic Attack mission for DoD:

- **carrier squadrons,** which deploy on aircraft carriers and conduct periodic FCLP to requalify to land on aircraft carriers
- **expeditionary squadrons,** including the reserve squadron, deploy to overseas land-based locations and therefore do not normally require periodic FCLP prior to deployment
- **the training squadron,** which is also known as the Fleet Replacement Squadron, or FRS. The training squadron is responsible for "post-graduate" training of newly designated Navy pilots and Naval Flight Officers, those returning to flight status after non-flying assignments, or those transitioning to a new aircraft for duty in the Fleet. The training squadron is the "schoolhouse" where pilots receive their initial FCLP, and it fosters professional standardization and a sense of community.

Electronic warfare has played a key role in combat operations since being first introduced during World War II, and its importance continues to grow as potential adversaries invest in modern threat systems. The mission of the Navy's Growler aircraft is to suppress enemy air defenses and communications systems. Additionally, Navy Growlers disrupt land-based threats in order to protect the lives of U.S. ground forces. The Secretary of Defense directed that the tactical Airborne Electronic Attack mission is the exclusive responsibility of the Navy. As a result, the Navy is the only U.S. military service to maintain a tactical airborne electronic attack capability and is required to preserve and cultivate the expertise and knowledge of the Growler community.

In addition to the Growler community, Ault Field is the West Coast home to the Maritime Patrol community and a Fleet Air Reconnaissance squadron consisting of three P-3C Orion squadrons, one reserve P-3C Orion squadron, and one EP-3 squadron. Maritime Patrol and Fleet Air Reconnaissance aircraft conduct airfield operations at Ault Field but do not conduct any airfield operations at OLF Coupeville. On June 3, 2014, the Navy signed a ROD to replace the existing three P-3C Orion squadrons with six P-8A Poseidon squadrons at Ault Field. The P-8A Poseidon began arriving at Ault Field in 2016, and the transition from three P-3C Orion squadrons to six P-8A Poseidon squadrons is expected to be complete in 2020. Furthermore, the one EP-3 squadron is slated for disestablishment by 2021. Ault Field also supports a unit of MH-60 search and rescue helicopters and a squadron of C-40 aircraft.

FCLP at OLF Coupeville provides a realistic training environment for both student pilots and experienced pilots to prepare for landing on aircraft carriers. A series of day and night FCLP must be performed by all pilots before landing the Growler on an aircraft carrier for the first time, or, for experienced pilots, after a period of absence away from the aircraft carrier environment. Training at OLF Coupeville allows pilots, as well as Landing Signal Officers (LSOs), the opportunity to train in a closed pattern, or a pattern without interference from other aircraft. LSOs are highly trained carrier pilots who instruct and critique aircrews' landing performance from the flight deck. During FCLP, LSOs are stationed next to the approach end of the runway and train and evaluate pilots while providing an additional margin of safety during each landing.

Since OLF Coupeville is dedicated primarily to FCLP (although it also supports helicopter operations), pilots and LSOs can maximize the number of practice landings in a given timeframe while significantly benefitting from the unique environment OLF Coupeville provides. Using OLF Coupeville allows the Navy to conclude daily operations in less time, thereby reducing community impacts. When performing FCLP at Ault Field, operations are often hindered due to multiple types of aircraft flying patterns around

the field that differ from the prescribed FCLP pattern and that extend flights beyond the normal pattern. Operations by non-FCLP aircraft (e.g., Growlers not performing FCLP, P-3s, P-8s, EP-3s, MH-60s, C-40s, cargo and passenger aircraft, and other transient aircraft) degrade FCLP due to aircraft separation requirements, varying field lighting and topography requirements, and specific approach requests. This degradation in training can occur for FCLP pilots as well as non-FCLP pilots, who, in some cases, are precluded from practicing their own landings due to aircraft limitations in the pattern. For example, aircraft may have take-offs, practice approaches, or landings delayed or denied. An inability to accomplish required training due to pattern congestion disrupts training schedules and increases operational costs to the Navy. Performing FCLP at Ault Field can be more impactful to the community by extending flight patterns, repeating training, extending daily operations later into the night, and impacting more densely populated areas.

The field elevation of OLF Coupeville is 200 feet above mean sea level, and the aircraft landing pattern for the field is 800 feet above mean sea level. The altitude above ground at which the aircraft fly the landing pattern at OLF Coupeville closely replicates the altitude of the aircraft carrier landing pattern. Practicing at an altitude that simulates the carrier environment is essential for pilots preparing to land on an aircraft carrier because such practice matches the visual cues as well as the required power settings needed to fly a safe approach for an actual landing on an aircraft carrier; however, Growlers do not normally land at OLF Coupeville. The proximity of OLF Coupeville to Ault Field allows for more training to be conducted per fuel load and provides a safe divert field if an emergency arises. Finally, OLF Coupeville is close enough to Ault Field so the LSO, who for safety and training reasons is required to be present at the field and in radio contact with the pilots performing FCLP, may brief the participating aircrew on training procedures and then drive to the OLF in a reasonable amount of time to be present for the training.

1.5 Scope of Environmental Analysis

This EIS includes an analysis of potential environmental impacts associated with the No Action Alternative and action alternatives. In general, environmental analysis involving aircraft operations at military airfields requires an analysis of noise, air quality, biological resources, and land use compatibility. New facility construction generally requires analysis of potential impacts to topography and soils, water resources and wetlands, biological resources, and cultural resources. Changes in personnel levels generally require analysis of socioeconomics, community services, safety, infrastructure and utilities, and transportation. The study area for each resource analyzed may differ due to how the Proposed Action interacts with or impacts the resource. For instance, the study area for geological resources may only include the construction footprint of a building, whereas the noise study area would expand out to include areas that may be impacted by airborne noise.

For the affected environment analysis, environmental conditions for each resource are evaluated using the best available data for that specific resource. Depending on the resource and best available data, the affected environment conditions may vary. For example, the noise discussion uses the year 2021 to describe the affected environment, when previous aircraft loading decisions unrelated to the Proposed Action are expected to be fully implemented and complete, whereas the biological resource discussion uses the most current and best available species data sets and surveys to inform the analysis.

This EIS assesses the potential environmental effects of continuing and expanding the existing Growler operations at the NAS Whidbey Island complex and analyzes aircraft operations conducted in the vicinity of Ault Field and OLF Coupeville. The following topics are evaluated in this EIS:

- Airspace and Airfield Operations
- Noise Associated with Aircraft Operations (Noise)
- Public Health and Safety
- Air Quality
- Land Use
- Cultural Resources
- American Indian Traditional Resources
- Biological Resources
- Water Resources
- Socioeconomics
- Environmental Justice
- Transportation
- Infrastructure
- Geological Resources
- Hazardous Materials and Wastes
- Climate Change and Greenhouse Gases

Additional information about specific resource areas is included in the following appendices to this EIS: Appendix A, Draft Aircraft Noise Study; Appendix B, Air Emissions Calculations; Appendix C, Section 106 Documentation; Appendix D, Transportation Trip Generation Data; Appendix E, Land Use Data, High-tempo FCLP Year; Appendix F, Environmental Justice Data, High-tempo FCLP Year; Appendix G, Coastal Consistency Determination; and Appendix H, Civilian Airfield Analysis.

1.6 Key Documents

Key documents are sources of information incorporated into this EIS. Documents are considered key because of similar actions, analyses, or impacts that may apply to the Proposed Action. Although these NEPA documents address actions that are separate and distinct from the Proposed Action analyzed in this EIS, the potential cumulative effects from these actions have been considered in the preparation of this EIS and are described further in Chapter 5, Cumulative Impacts.

2005 Environmental Assessment for Replacement of Prowler Aircraft with Growler Aircraft at NAS Whidbey Island

This document analyzed the environmental consequences of transitioning Growler carrier squadrons at NAS Whidbey Island from the older Prowler aircraft to the newer Growler aircraft. A Finding of No Significant Impact (FONSI) was signed on July 19, 2005. The transition of Prowler squadrons to the Growler aircraft was completed in April 2016.

2012 Environmental Assessment for the Expeditionary Transition of Prowler Squadrons to the Growler at NAS Whidbey Island

This Environmental Assessment (EA) analyzed the potential environmental effects of transitioning the expeditionary Electronic Attack squadrons at NAS Whidbey Island from the aging Prowler to the newer Growler in the 2012 through 2014 timeline. The action included retaining the expeditionary Electronic Attack squadrons at NAS Whidbey Island; performing the in-place transition of three existing expeditionary Electronic Attack squadrons home based at NAS Whidbey Island from the Prowler aircraft to the Growler aircraft; relocating one reserve expeditionary Electronic Attack Prowler squadron from Joint Base Andrews to NAS Whidbey Island and transitioning from the Prowler aircraft to the Growler aircraft; adding up to 11 Growler aircraft to the FRS at NAS Whidbey Island to support the expeditionary Electronic Attack community; modifying certain facilities at Ault Field to provide infrastructure and functions to support the new aircraft type; and a modest increase in personnel to support the expeditionary Electronic Attack community. The purpose of the transition was to provide deployable, land-based expeditionary Electronic Attack community assets that meet DoD requirements. A FONSI for the EA was signed on October 30, 2012. The in-place transitions and relocation of the reserve squadron were completed in 2014.

2008 EIS and 2014 Supplemental EIS for Introduction of the P-8A Multi-Mission Maritime Aircraft into the U.S. Navy Fleet

An EIS and Supplemental EIS were prepared to analyze the potential environmental impacts associated with the introduction of P-8A Poseidon aircraft into the Navy Fleet. In 2008, the Navy decided to provide facilities and functions to support home basing 12 P-8A Poseidon squadrons and one FRS into the Navy Fleet. The P-8A Poseidon will replace the current maritime patrol aircraft, the P-3C Orion, at the three existing maritime patrol home bases. In light of changing conditions after completion of the original EIS (ROD signed on December 23, 2008), the Navy prepared a Supplemental EIS. The Supplemental EIS (ROD signed June 3, 2014) selected NAS Jacksonville and NAS Whidbey Island as the two home base locations. At NAS Whidbey Island, the existing three P-3C Orion squadrons will be replaced with six P-8A Poseidon squadrons. The P-8A aircraft began arriving at Ault Field in 2016, and the transition from P-3C Orion to P-8A Poseidon aircraft is expected to be complete in 2020.

2014 Environmental Assessment for Pacific Northwest Electronic Warfare Range

This EA tiered off the analysis in the 2010 Northwest Training Range Complex Final EIS/Overseas Environmental Impact Statement (OEIS), which analyzed at-sea and inland training including electronic warfare training in existing Military Operations Areas (MOAs). This EA proposed to improve existing training with the use of a fixed emitter site and up to three mobile emitter vehicles that would transmit signals to aircraft for aircrew to detect, locate, and identify. The ground-based emitters are intended to improve flight training by providing air crews with more varied signal locations. This EA analyzes only the impacts associated with use of the ground-based emitters and does not cover the flight training that already occurs in the existing MOAs. The existing flight training in the MOAs is analyzed in separate NEPA documents and would continue in the same locations and in the same manner as they have for many years. The Navy completed the EA and issued a FONSI on August 28, 2014. The Navy has applied for a permit from the U.S Forest Service to drive the mobile emitter vehicles on existing roads and cutouts and is coordinating with the Washington State Department of Natural Resources for similar authorization on state lands.

2015 EIS/Overseas Environmental Impact Statement for Northwest Training and Testing

An EIS/OEIS was prepared to analyze the potential environmental impacts associated with training and testing activities primarily within existing range complexes, operating areas, testing ranges, and selected pier-side locations in the Pacific Northwest, which includes areas where Growler aircraft currently train. The Final EIS/OEIS was publicly released on October 2, 2015, and is awaiting a ROD.

2015 EIS for Military Readiness Activities at Naval Weapons Systems Training Facility Boardman

An EIS was prepared for a Navy proposal to continue and enhance Navy and Oregon National Guard training at Naval Weapons Systems Training Facility Boardman, Oregon. The Draft EIS was released in September 2012. The Final EIS was released publicly on December 18, 2015, and a ROD was signed on March 31, 2016. The Naval Weapons Systems Training Facility Boardman EIS analyzes current and future Growler training requirements at the facility.

1.7 Relevant Laws and Regulations

The Navy has prepared this EIS based upon federal and state laws, statutes, regulations, and policies that are pertinent to the implementation of the Proposed Action, including the following:

- NEPA (42 U.S.C. sections 4321-4370h), which requires an environmental analysis of major federal actions that have the potential to significantly impact the quality of the human environment
- CEQ Regulations for Implementing NEPA (40 Code of Federal Regulations [CFR] parts 1500-1508)
- Navy regulations for implementing NEPA (32 CFR part 775), which provides Navy policy for implementing CEQ regulations and NEPA
- Clean Air Act (42 U.S.C. section 7401 et seq.)
- Clean Water Act (33 U.S.C. section 1251 et seq.)
- Coastal Zone Management Act (16 U.S.C. section 1451 et seq.)
- National Historic Preservation Act (54 U.S.C. section 306108 et seq.)
- Endangered Species Act (16 U.S.C. section 1531 et seq.)
- Magnuson-Stevens Fishery Conservation and Management Reauthorization Act (16 U.S.C. section 1801 et seq.)
- Marine Mammal Protection Act (16 U.S.C. section 1361 et seq.)
- Migratory Bird Treaty Act (16 U.S.C. sections 703-712)
- Bald and Golden Eagle Protection Act (16 U.S.C. section 668-668d)
- Fish and Wildlife Coordination Act of 1996 (16 U.S.C. 661)
- Safe Drinking Water Act of 1974 (42 U.S.C. 300f et seq.)
- Resource Conservation and Recovery Act (42 U.S.C. 6901 et seq.)
- Comprehensive Environmental Response, Compensation and Liability Act (42 U.S.C. 9601 et seq.)
- Sikes Act Improvement Act of 1997 (16 U.S.C. 670)
- Federal Aviation Act of 1958 (49 U.S.C. 1301 et seq.)

- Federal Noxious Weeds Act of 1970 (7 U.S.C. 2803 and 2809)
- Energy Independence and Security Act of 2007
- Emergency Planning and Community Right to Know Act
- Pollution Prevention Act of 1990
- Executive Order (EO) 11990, Protection of Wetlands
- EO 11988, Floodplain Management
- EO 12088, Federal Compliance with Pollution Control Standards
- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations
- EO 13045, Protection of Children from Environmental Health Risks and Safety Risks
- EO 13423, Strengthening Federal Environmental, Energy, and Transportation Management
- EO 13175, Consultation and Coordination with Indian Tribal Governments
- EO 13693, Planning for Federal Sustainability in the Next Decade

A description of the Proposed Action's consistency with these laws, policies, and regulations, as well as the names of regulatory agencies responsible for their implementation, is presented in Chapter 6.

1.8 Agency Participation and Intergovernmental Coordination

Regulations from the CEQ (40 CFR Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. The Navy solicited agency comments during two scoping periods and conducted a total of eight scoping meetings. Elected officials and federal and state agencies were invited to attend public meetings, submit comments, and participate in the development of this EIS. The Navy is coordinating with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and Washington State Department of Ecology regarding the Proposed Action. Based on early coordination with these federal and state agencies supporting documentation and consultation items will be prepared and submitted as needed (e.g., Biological Assessment). A National Historic Preservation Act Section 106 consultation process will be completed with the State Historic Preservation Office and the Advisory Council on Historic Preservation, as needed. A Coastal Consistency Determination will be prepared and submitted to the Washington State Department of Ecology. The following federally recognized American Indian tribes and nations were invited to initiate government-to-government consultation:

- Jamestown S'Klallam Tribe
- Lummi Tribe of the Lummi Reservation
- Samish Indian Nation
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

1.9 Public Participation

1.9.1 Public Scoping

Scoping is a fundamental part of the EIS process. Scoping informs the public about the Proposed Action and alternatives and allows the public and interested stakeholders to identify issues and concerns of particular interest to affected communities. Comments received during the public comment periods were considered in preparing the Draft EIS. Specifically, the Navy solicited scoping comments from elected officials, American Indian tribes and nations, agencies, and the general public to determine what topics should be studied and analyzed in the EIS. In addition to soliciting comments for preparation of the EIS, the Navy used the NEPA scoping process to solicit comments related to Section 106 of the National Historic Preservation Act. Section 1.9.4.1 provides a summary of scoping comment topics. The Navy will hold public meetings and solicit public comments on the Draft EIS. The locations and dates of these meetings will be published in a Notice of Public Meetings in the *Federal Register* and in local newspapers and other outlets.

Two separate scoping efforts were completed for this project:

1. **2013-2014 Scoping Efforts**[2]
   A 139-day initial public scoping period was conducted from September 5, 2013, to January 3, 2014, and reopened from January 13 to 31, 2014, and included three scoping meetings held in Coupeville, Oak Harbor, and Anacortes, Washington.
2. **2014-2015 Scoping Efforts**[3]
   A 93-day re-scoping effort was conducted from October 8, 2014, to January 9, 2015, which included a total of five scoping meetings held in Coupeville, Oak Harbor, Anacortes, Lopez Island, and Port Townsend, Washington.

2013-2014 Scoping Efforts

The initial scoping efforts for the EIS commenced in September 2013. This effort focused on the Navy's proposal to introduce two additional Growler expeditionary squadrons (two squadrons of five aircraft each) and the addition of three Growler aircraft to the training squadron, for a total of 13 additional aircraft, and the continuation and increase of Growler operations at Ault Field and OLF Coupeville. The EIS scope also included an assessment of the distribution of operations between Ault Field and OLF Coupeville.

2014-2015 Scoping Efforts

In the spring of 2014, following completion of the first scoping efforts, the Chief of Naval Operations requested the purchase of additional Growler aircraft as part of the Unfunded Requirements List in the President's Budget for Fiscal Year 2015. While it was unclear at that time how many Growler aircraft would ultimately be procured, if any, the Navy elected to analyze the potential environmental impacts of these additional aircraft in order to be proactive and transparent. Therefore, the Navy revised the

[2] A Notice of Intent was published on September 5, 2013 (78 FR 54635). A notice to re-open scoping and extend the scoping period through January 31 was published on January 17, 2014 (79 FR 3188).

[3] A Revised Notice of Intent was published on October 10, 2014 (79 FR 61296). An extension notice was published on November 17, 2014 (79 FR 221).

scope of the ongoing EIS originally presented to the public in 2013 and initiated a new scoping effort on October 8, 2014, which was completed on January 9, 2015.

The revised EIS scope, as communicated to the public, focused on the Navy's revised proposal to add up to 36 Growler aircraft to support an expanded Electronic Attack mission. This includes training at Ault Field and OLF Coupeville, and the continuation and increase in Growler operations at these two airfields, including the distribution of operations between the two airfields.

1.9.2 Scoping Notifications

A range of notification tools were used during both scoping efforts to: 1) publicize the issuance of the Notice of Intent for each scoping period; 2) provide details on the proposals and the times, dates, and locations of the scoping meetings; and 3) describe ways to comment. Notification tools included mailings (letters and postcards), newspaper display advertisements, press releases, and the use of the project website (see Table 1.9-1). Two additional methods of notification were used during re-scoping efforts: digital advertisements (i.e., advertisements on the newspaper websites) and phone calls to elected leaders.

Table 1.9-1 Summary of Public Scoping Notifications for the Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

	2013-2014[1]		*2014-2015*[2]	
Notification Method	***Total for Initial Scoping Period***	***Total for Scoping Extension***	***Total for Re-scoping Period***	***Total for Re-scoping Extension***
Mailings to addressees on initial mailing list[3]	350	-	771	-
Letter	72	-	86	-
Postcard	278	-	685	705
Newspapers with paid advertisements	6	8	8	8
Paid print advertisements (days)	25	14	28	28
Paid digital advertisements (days)	-	-	7 sites, for a total of 14 days each	8 sites, for a total of 14 days each
Media outlets that received press release	48	49	45	45
Phone calls to elected leaders	-	-	70	-
Website visits	3,454	1,103	2,553	3,567
Libraries with scoping materials	-	-	14	

Notes:

1 A 139-day initial public scoping period was conducted from September 5, 2013, to January 3, 2014, and from January 13 to 31, 2014.

2 A 93-day re-scoping effort was conducted from October 8, 2014, to January 9, 2015.

3 See Chapter 9 for the distribution list for these mailings.

1.9.3 Scoping Meetings

The Navy held two sets of public scoping meetings (Table 1.9-2):

- **2013-2014**, which included three scoping meetings held in Coupeville, Oak Harbor, and Anacortes, Washington
- **2014-2015**, which included five scoping meetings held in Coupeville, Oak Harbor, Anacortes, Lopez Island, and Port Townsend, Washington

Table 1.9-2 Public Scoping Meeting Dates and Locations for the Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

Date	*Location*
Tuesday, December 3, 2013 4:00 pm to 8:00 pm	Coupeville High School 501 South Main Street Coupeville, WA 98239
Wednesday, December 4, 2013 4:00 pm to 8:00 pm	Oak Harbor High School 1 Wildcat Way Oak Harbor, WA 98277
Thursday, December 5, 2013 4:00 pm to 8:00 pm	Anacortes Middle School 2202 M Avenue Anacortes, WA 98221
Tuesday, October 28, 2014 4:00 pm to 8:00 pm	Coupeville High School Commons Area 501 South Main Street Coupeville, WA 98239
Wednesday, October 29, 2014 4:00 pm to 8:00 pm	Oak Harbor Elks Lodge 155 NE Ernst Street Oak Harbor, WA 98277
Thursday, October 30, 2014 4:00 pm to 8:00 pm	Anacortes High School Cafeteria 1600 20th Street Anacortes, WA 98221
Wednesday, December 3, 2014[1] 3:00 pm to 6:00 pm	Lopez Center for Community and Arts 204 Village Road Lopez Island, WA 98261
Thursday, December 4, 2014[1] 3:00 pm to 6: 00 pm	Fort Worden Conference Center, Commons B and C 200 Battery Way Port Townsend, WA 98368

Notes:

[1] The Navy added two additional meetings (Lopez Island and Port Townsend) at the request of Congressional leaders. A Notice of Extension of Public Scoping Period and Additional Public Scoping Meetings was published on November 17, 2014 (79 FR 68423).

Scoping meetings were conducted in an open-house format designed to enhance public understanding of the project and the NEPA process, and to allow members of the public to identify for Navy representatives issues and concerns they would like to see addressed in the EIS. During the scoping meetings, attendees could speak individually with Navy representatives and submit written and oral comments. Scoping information materials were made available in paper copy to scoping meeting attendees and in electronic data files downloaded from the project website. Meeting start times and duration varied from 3 to 4 hours based on local conditions to accommodate travel distances, the schedules for ferries used by the public attending the meetings, tidal variance, and peak hours for public attendance. Across all eight scoping meetings, a total of 1,307 individuals were counted in attendance, including federal and state elected officials, the media, city government agencies, and local community planning groups.

During the 2014-2015 scoping effort, the Navy expanded its public outreach and provided paper copies of the scoping information materials at various libraries in the area (Table 1.9-3).

Table 1.9-3 Libraries and Locations Provided Paper Copies of Scoping Information Materials (2014-2015 Scoping Efforts) for the Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

Library	*Location*
Oak Harbor City Library	1000 SE Regatta Drive Oak Harbor, Washington
Anacortes Public Library	1220 10th Street Anacortes, Washington
La Conner Regional Library	614 Morris Street La Conner, Washington
Coupeville Library	788 NW Alexander Street Coupeville, Washington
San Juan Island Library	1010 Guard Street Friday Harbor, Washington
Lopez Island Library District	2225 Fishermen Bay Road Lopez Island, Washington
Orcas Island Public Library	500 Rose Street Eastsound, Washington
Island Library	2144 South Nugent Road Lummi Island, Washington
Camano Island Library	848 North Sunrise Boulevard Camano Island, Washington
Mount Vernon City Library	315 Snoqualmie Street Mount Vernon, Washington
Port Townsend Public Library	1220 Lawrence Street Port Townsend, Washington
Guemes Island Library	7549 Guemes Island Road Anacortes, Washington
Seattle Public Library	1000 4th Avenue Seattle, Washington
Burlington Public Library	820 East Washington Avenue Burlington, Washington

1.9.4 Scoping Comments

Comments were received from elected officials, American Indian tribes and nations, federal regulatory and state resource agencies, business and community leaders, organizations, and individuals. Comments received during scoping were provided through one or more of the following five comment-submittal methods:

- in writing, while attending one of the meetings
- orally to the stenographer, while attending one of the meetings
- electronically, via the project website at www.whidbeyeis.com
- electronically, via email
- in writing, by mail

Comments pertaining to this project that were submitted during public involvement efforts for other regional NEPA projects were collected and considered in the development of this EIS. Any comments pertaining to this project but submitted during other regional NEPA project public involvement efforts were collected and have been considered in the development of this EIS. Similarly, comments submitted during public meetings for this project but which pertain to other regional NEPA projects were forwarded to those project teams as appropriate for consideration in the preparation of their projects. In total, 73 comments from other project meetings were forwarded to this project team, and, in turn, this project team forwarded 192 comments to other projects. Table 1.9-4 summarizes the total number of scoping comments submitted through all methods made available to the public during each scoping period.

Table 1.9-4 Summary of Comment Methods during Public Scoping for the Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

	2013-2014 Scoping[3]	*2014-2015 Re-scoping*[4]
Method of Comment Submittal	***Number of Comments Received***[5]	
Written Comments Submitted at Scoping Meetings[2]	149	276
Oral Comments Submitted at Scoping Meetings	29	67
Comments Submitted via the Website	1,122	1,473
Comments Emailed	262	8
Comments Mailed	102	146
Comments Received from Other NEPA Efforts[1]	14 (P-8A Draft Supplemental EIS)	59 (NWTT Supplemental Draft EIS, Electronic Warfare Range EA, and Transit Protection System Pier EA)
Total	1,678	1,970

Table 1.9-4 Summary of Comment Methods during Public Scoping for the Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

	2013-2014 Scoping[3]	*2014-2015 Re-scoping*[4]
Method of Comment Submittal	***Number of Comments Received***[5]	

Notes:

1 In addition to the project team receiving comments from other concurrent projects being conducted within the region, comments were received during the re-scoping process for the Growler EIS that pertain to the NWTT Supplemental Draft EIS and the Electronic Warfare Range EA. In total, 192 comments were forwarded to other project teams for review and consideration. Of the 192 forwarded comments, 36 were provided to the project team for the NWTT Supplemental Draft EIS/Overseas Environmental Impact Statement, and 156 comments were provided to the project team for the Electronic Warfare Range EA.

2 Comments collected during the 2013 Oak Harbor scoping meeting included a variety of studies, reports, and literature provided by the Citizens of Ebey's Reserve.

3 A 139-day initial public scoping period was conducted from September 5, 2013, to January 3, 2014, and from January 13 to 31, 2014.

4 A 93-day re-scoping effort was conducted from October 8, 2014, to January 9, 2015.

5 A comment is an individual communication received (e.g., letter, email, oral statement). Any one comment (e.g., letter, email, oral statement) may include several issues or topics. Comments are counted based on the number of individual communications received (e.g., letters, emails, oral statements).

Key:

EA = Environmental Assessment
EIS = Environmental Impact Statement
NEPA = National Environmental Policy Act
NWTT = Northwest Training and Testing

1.9.4.1 Summary of Comment Issues and Commenters

Table 1.9-5 provides a summary of all comments received by issue or topic area across the two scoping efforts. The alternatives analysis, human health effects, noise and vibration, socioeconomic impacts, and biological resources were the top five named issues identified during both scoping efforts. Of the comment topics raised, general support of the project constituted 27 percent of the total comments received during the 2013-2014 scoping efforts and 15 percent of the total comments received during the 2014-2015 scoping efforts.

Table 1.9-5 Comparison of Comment Issues and Quantities of Public Scoping Comments for the Environmental Impact Statement for EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex

Topic/Issue/Concern	*Number of Comment Topics/Issues/Concerns*	
	2013-2014	*2014-2015*
1. General Support	459	303
2. Purpose and Need	3	8
3. Project Description/Proposed Action	176	19
4. Alternatives	287	334
5. National Environmental Policy Act Process/Public Involvement	55	300
6. Specific Resources		
a. Airfield Operations	138	114
b. Noise and Vibration	783	1,002
c. Noise Disclosure	57	31
d. Land Use and Recreation	205	73
e. Public Safety	207	56
f. Human Health Effects	433	481
g. Socioeconomics[1]	502	304
h. Environmental Justice	183	107
i. Air Quality	142	65
j. Transportation	16	13
k. Community Facilities and Services	11	8
l. Aesthetics	10	0
m. Hazardous Materials and Waste[2]	105	30
n. Biological Resources	396	145
o. Topography, Geology, and Soils	181	22
p. Water Resources	66	15
q. Cultural Resources	163	40
r. Cumulative Effects	43	27

Notes:
[1] Comments related to property values were considered under the topic of Socioeconomics.
[2] Comments related to fuel dumping were considered under the topic of Hazardous Materials and Wastes.

In addition to the above-referenced issues, specific comment topics were identified during the two scoping efforts. Each topic is detailed below, with information provided on how this issue is considered within the EIS analysis.

- **Best Available Science and Analysis Methodology.** Some commenters requested that the EIS document peer-reviewed studies and articles, particularly those related to potential health effects (nonauditory) of aircraft noise on humans and wildlife. A comprehensive noise study (Appendix A) was prepared for this EIS, and specific discussions on key topics are addressed in Section 4.2 (Noise) and Section 4.8 (Biological Resources), respectively. Although there is no consensus within the scientific community that supports a relationship between aircraft noise exposure and nonauditory health impacts for residents living near military or civilian airfields, a discussion of the research on nonauditory health impacts is included in Section 4.2 (Noise) and in the noise study (Appendix A).

- **Fuel Dumping**. The issue of fuel dumping (the release of aviation fuel during flight operations) was raised by some commenters during scoping. Fuel release procedures are governed by the Federal Aviation Administration and Navy rules. Navy pilots are prohibited from dumping fuel at altitudes below 6,000 feet above ground level, except in an emergency situation. Related environmental impacts are addressed in Section 4.4 (Air Quality) and Section 4.15 (Hazardous Materials and Waste).
- **Noise Mitigation.** Commenters requested information on the measures that would be taken by the Navy to mitigate potential noise impacts as a result of implementing the Proposed Action. The Navy has an active Air Installations Compatible Use Zones program in place at the NAS Whidbey Island complex; the program's goals are to protect the safety, welfare, and health of those who live and work near military airfields while preserving the military flying mission. The Navy will continue to address local concerns about aircraft noise through implementation of this long-standing program in coordination with the community. Additionally, the installation frequently corresponds with numerous media outlets and utilizes its webpage and social media, such as the station's Facebook page, to share flight schedules and other information and to solicit public feedback. Where possible and if weather conditions allow, station officials modify fight operations to minimize noise impacts, such as during weekends and during school exams. The installation continuously reviews flight procedures to determine whether there are any changes that could help reduce noise on the surrounding population. The installation will continue to publish FCLP schedules and issue notifications for additional activities, such as weekend festivals. The Navy is also considering other noise reduction measures, such as construction and operation of a noise suppression facility for engine maintenance (also known as a "hush house") and actively researching engine design solutions to reduce overall sound emissions from the engines of the FA-18E/F "Super Hornet" and Growler in addition to other measures that may reduce the number of FCLPs required. These measures include the following:
    - **Chevrons.** The Navy is testing the use of chevrons (ceramic strips placed in the exhaust nozzle of a jet engine for sound reduction). Chevron testing in October 2014 confirmed that this technology has some positive effect, but it also disclosed that some redesign of the exhaust nozzle chevrons will be necessary to achieve noise reduction benefits in the Super Hornet and Growler. The Navy will continue to explore different technologies to reduce the noise impacts from aircraft.
    - **MAGIC CARPET.** MAGIC CARPET (Maritime Augmented Guidance with Integrated Controls for Carrier Approach and Recovery Precision Enabling Technologies) is a flight control system that automates some controls to assist pilots with landing on aircraft carriers, making the process easier. In addition, the technology potentially reduces the workload and training required for pilots to develop and maintain proficiency for shipboard landings. This technology could eventually result in a decrease of future training requirements, resulting in fewer FCLPs at locations such as the NAS Whidbey Island complex. Initial capabilities of MAGIC CARPET completed its first shore-based flight on the Super Hornet and the Growler on February 6, 2015. It has already been successfully demonstrated on the F-35C Joint Strike Fighter during operational testing. The full capabilities of MAGIC CARPET will be released in 2019 timeframe. While this system's impact on future training has not been fully realized, it has the potential to significantly reduce training requirements for FCLPs.

Sections 3.2 and 4.2 (Noise) provide details on the affected environment and analysis relevant to this Proposed Action.

- **Cumulative Impacts of Ongoing Regional NEPA Studies.** Multiple Navy actions are ongoing within the Pacific Northwest Region; several commenters inquired about each action and how they are connected to one another. All such NEPA actions and their potential cumulative impacts are identified and addressed in Chapter 5 (Cumulative Effects) of this EIS.
- **Previous NEPA Studies.** Because multiple Navy actions have previously occurred at the NAS Whidbey Island complex, several commenters inquired about how earlier studies are related to the current Proposed Action. Section 1.6 (Key Documents) provides details on the studies relevant to this Proposed Action. Documents are considered key because of similar actions, analyses, or impacts that are either directly relevant or inform the analysis of this Proposed Action.
- **Segmentation.** Some commenters raised the issue of segmentation (i.e., analyzing impacts of connected actions independently instead of collectively in the same NEPA document), feeling that this Proposed Action may be improperly segmented under NEPA from other proposed actions in the Pacific Northwest. Each NEPA document addresses a specific proposed action, separated from other actions by its purpose and need, independent utility, timing and geographic location. Some NEPA documents are stand-alone documents; others tier off of and/or expand the analyses of other existing NEPA documents. NEPA documents for at-sea training (e.g., the Northwest Training and Testing EIS/OEIS) focus on training activities occurring within a range complex or MOA and involve different types of aircraft, ships, and range complex enhancements. However, NEPA documents that analyze a specific type of aircraft operation at a military airfield (in this case, the Growler) are focused in and around that airfield and its facility needs. While the Navy has analyzed, and is currently analyzing, various proposed actions in the area, those proposed actions are not preconditions for Growler operations at the NAS Whidbey Island complex. Growler operations at the NAS Whidbey Island complex are not a precondition for larger military readiness activities on range complexes in the Pacific Northwest. Even in the absence of this Proposed Action, military training in the Pacific Northwest would continue independently from this Proposed Action as analyzed in the documents referenced in Section 1.6. The Navy does consider the impacts from past, present, and reasonably foreseeable future actions in Chapter 5 (Cumulative Impacts).
- **Flight Tracks**. During scoping, some commenters requested additional information on the flight tracks used by Growler aircraft at the NAS Whidbey Island complex. Air Traffic Control (ATC) services to all aircraft operating within the Class C airspace are provided by the NAS Whidbey Island ATC facility. The NAS Whidbey Island ATC facility is responsible for the safe, orderly, and expeditious flow of all civil and military air traffic and provides the en-route traffic control service within 2,100 square miles of the airspace surrounding the Class C airspace. This EIS examines existing airspace conditions in Section 3.1 and impacts to airspace under each alternative in Section 4.1.
- **Explanation of Operations Types and Training Needs**. During scoping, some commenters requested a more comprehensive explanation of the various types of operations (such as FCLP) completed by Growler aircraft at the NAS Whidbey Island complex. In addition, some commenters requested additional information on the need for this action and reasoning why

another type of training or alternative was not being analyzed (e.g., alternatives to home basing and conducting FCLP). This EIS examines air operations in Section 3.1 and any proposed changes to air operations under each alternative in Section 4.1. In addition, the EIS addresses the need for this Proposed Action in Section 1.3 (Purpose of and Need for the Proposed Action).

- **Points of Interest.** Concern over Growler-associated noise was raised by commenters during public scoping. As part of the noise modeling and supplemental noise analysis associated with this EIS, a variety of points of interest (POIs) were identified and modeled around the installation and surrounding communities to provide broad coverage and context to compare the No Action Alternative with the action alternatives. These POIs include residential neighborhoods, schools, hospitals, and recreational areas. POIs have been selected for analysis throughout Island County, as well as in the surrounding counties of San Juan, Jefferson, Clallam, Snohomish, and Skagit. In addition, one POI was identified in British Columbia, Canada. This POI is illustrated on Figure 3.2-6 and listed in Table 3.2-4 of this EIS.
- **Australian Air Force Operations**. Comments on the Navy's three-year training program for pilots in the Australian Air Force were received during the scoping efforts. This training activity is not part of the Proposed Action; however, these operations are included as part of the affected environment analysis as they are in progress and ongoing (see Sections 3.1, Airspace and Airfields, and 3.2 Noise).
- **Sonic Booms**. Sonic booms (the sound created by an object traveling faster than the speed of sound, or when aircraft are traveling at or above Mach 1.0.) were identified during scoping as an issue of concern pertaining to Growler aircraft. Navy regulations strictly control supersonic flight and provide that sonic booms shall not be intentionally generated below 30,000 feet of altitude unless over water and more than 30 miles from inhabited land areas. Supersonic flight over land or within 30 miles offshore may only be conducted in specifically designated areas, and no such areas exist in the study area. The training activities that have the potential to produce sonic booms occur well out at sea in the Northwest Training Range Complex and are covered in a separate NEPA document. Northwest Training Range Complex rules prohibit supersonic flight except when greater than 30 nautical miles off shore of the Pacific Coast and clear of ship traffic and personnel. For this reason, sonic booms are rarely heard in the vicinity of the NAS Whidbey Island complex and can be confused with seismic or atmospheric events and industrial activities. Since Navy rules strictly control supersonic flight over land, this Proposed Action is not anticipated to result in any increase in the instances of sonic booms in the study area. A comprehensive noise study (Appendix A) was prepared for this EIS, and impacts associated with noise are further analyzed in Section 4.2.
- **Seasonal Impacts on Airfield Operations.** As noted by some commenters during scoping, airfield operations at the NAS Whidbey Island complex can be affected by weather delays and other seasonal issues (such as longer daylight hours during the summer months or shifts in the prevailing wind direction). Current airfield operations are illustrated in Section 3.1.2 of this EIS, and changes to operations under the various action alternatives are examined in Section 4.1.

1.9.5 Other Noise Reports

The Navy continues to evaluate noise reports that have been developed by independent sources and review their findings in conjunction with this EIS analysis. The following noise reports have been reviewed:

- National Park Service Report for Ebey's Landing National Historic Reserve (2016)

  In 2016, the National Park Service performed acoustical monitoring for the Ebey's Landing National Historic Reserve. The conditions measured by this study were actual aircraft noise over a 28-day period in June and July 2016. Although this differs from the affected environment modeled for calendar year 2021 in this EIS, the results of the study appear consistent with the Navy's previous noise analyses. Furthermore, the National Park Service's monitoring report demonstrates that, while military aircraft are loud, military aircraft operations are highly intermittent, with long periods of no military aircraft activity. For example, the report demonstrates that aircraft noise above 60 dB (normal conversation levels) occurred less than 1 percent of the time during the study period.

- Dalhgren Report on Combat Jet Noise from Landing and Taking Off at Whidbey Island OLF Coupeville (2015)

  In 2015, this opinion paper was developed by Dr. Dahlgren, a toxicologist, to support litigation by providing his opinion regarding the impact on public health from aircraft noise based on his review of the research on aircraft noise and on surveys from individuals expressing their opinion regarding their health. The report relies on conclusions on individual health that are not based on reviews of the medical records of individuals in question, some conclusions appear to have no supporting basis, and some conclusions are not consistent with, or are contrary to, the references cited in the report. The Navy has considered the best available science in the development of the Noise Study for this EIS and provides a detailed discussion of its findings in Section 3.2.

- JGL Acoustics, Inc. Report on Whidbey Island Military Jet Noise Measurements (2013)

  In 2013, JGL drafted a report in support of litigation that purported to compare limited short-term aircraft noise measurements with noise impacts reported in the 2005 Growler EA, which served as part of Dr. Dahlgren's opinion report. The JGL report, however, contained methodological flaws that make it unreliable for purposes of relating those short-term measurements to the annual conditions assessed in the 2005 EA. It also did not result in any findings that question the validity of Navy modeling.

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