UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

March 8, 2017

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

Dear Ms. Padgett:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the U.S. Department of the Navy EA-18G Growler Airfield Operations at the Naval Air Station Whidbey Island Complex (EPA Region 10 Project Number 13-0030-DOD). We are submitting comments on the DEIS in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We sincerely appreciate the Navy's efforts to prepare this NEPA analysis, conduct outreach and encourage public and agency participation, and facilitate the document review with briefings and an extended review period. We honor the courage and commitment of our armed forces and respect the Navy's mission and responsibilities in support of our Nation's defense.

The DEIS discusses the Navy's proposal to expand the existing EA-18G Growler fleet operations at NASWI complex by adding 35 or 36 aircraft to augment the current electronic warfare capabilities. Pilot training exercises include field carrier landing practices at Ault Field and Outlying Landing Field Coupeville. In support of the Growler fleet expansion, the Navy would also construct and renovate facilities at Ault Field in order to accommodate additional Growler aircraft and station additional military personnel and their families at NASWI and/or in the surrounding communities. The different alternatives would vary the assignment of additional aircraft among the expeditionary, carrier, and/or Fleet Replacement squadrons. Scenarios A, B, and C can be paired with any of 3 Action Alternatives. Scenario A would conduct 80% of FCLPs at OLF Coupeville and 20% at Ault Field; Scenario B would conduct 50% at OLF Coupeville and 50% at Ault Field; and Scenario C would conduct 20% at OLF Coupeville and 80% at Ault Field. Per Alternative 1, 2, or 3 respectively, the Navy would station 371, 664, or 377 additional personnel and 509, 910, or 894 family members at NASWI and in the surrounding communities.

Based on the information provided, the EPA is rating the DEIS as EC-2 (Environmental Concerns) with insufficient information. An explanation of the EPA Rating System for the DEIS is enclosed. The EPA acknowledges the use of best management practices referenced in the DEIS for the management of noise and appreciates the Navy's efforts to inform members of the public of the upcoming FCLPs and the procedures the community can follow for noise complaints. However, the DEIS does not contain sufficient information to fully assess the environmental impacts that should be avoided to fully protect the environment and nearby communities and we recommend that additional information and discussion be included in the final EIS as described below. Our recommendations are offered to assist the Navy in

completing its environmental review and to help ensure that the overall analysis fully assesses potential environmental impacts and available mitigation measures to protect human health and the environment as required by NEPA, while also meeting the Navy's need to run FCLP drills with an expanded fleet.

The EPA recommends that the Navy establish a monitoring program to verify that actual noise impacts are similar to those projected in this EIS. As part of this monitoring program, a protocol should be established that outlines when or if adaptive management measures are required. The EPA believes this on-the-ground validation would help provide an assessment of actual noise impacts projected to be experienced by Whidbey Island and surrounding area residents and wildlife due to the proposed expansion. For example, monitoring sensitive receptor sites within each projected DNL noise contour of 65dB and greater may help characterize more fully the actual duration, frequency, and intensity of exposures to noise-related impacts within these loudest projected contour zones.

We recommend that the noise monitoring discussed above be accompanied by a supplemental health assessment[1] of the affected population to characterize baseline conditions and projected health impacts of the proposed action to inform a pathway forward. We would be happy to help convene agencies and organizations for this assessment.

In addition, according to the EIS, "these [mobile source air pollutant] emissions contribute to regional emission totals and can affect compliance with the NAAQS." The final EIS should clarify how this will or will not affect the attainment status for this region. The EPA also recommends that the final EIS include an assessment of the hazardous air pollutants and as appropriate, a discussion of the Navy's plans to mitigate for the additional emissions. It may also be helpful to include in Table 3.4-3 the permit requirement thresholds for each criteria pollutant.

The EPA appreciates the information about the ongoing investigation to remove, dispose, and replace legacy aqueous film forming foam that contains perfluorooctane sulfonate and/or perfluorooctanoic acid. As part of the final EIS, the EPA requests that the Navy identify measures being taken to prevent further contamination to the sole source aquifer from legacy or new firefighting chemicals.

We have provided a list of studies on health effects and wildlife impacts that may be useful in the analysis of impacts associated with noise.[2] The EPA recommends that these studies be considered and

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[1] EPA's Health Impacts Assessment page (https://www.epa.gov/healthresearch/health-impact-assessments) and *Minimum Elements and Practice Standards for Health Impact Assessment*, September 2014 (http://advance.captus.com/planning/hia2xx/pdf/Minimum%20Elements%20and%20Practice%20Standards%20for%20HIA%203.0.pdf) each contain helpful best practices and information about conducting such assessments.

[2] Noise Studies:

- Goines, Lisa, RN and Hagler, Louis, MD. *Noise Pollution: A Modern Plague.* Southern Medical Journal, Volume 100: March 2007, pages 287-294.
- WHO (2010), *Burden of Disease from Environmental Noise: Quantification of Healthy Life Years Lost in Europe,* The World Health Organization (www.euro.who.int); at www.euro.who.int/_data/assets/pdf_file/0008/136466/e94888.pdf.
- Ising H, Kruppa B. *Health effects caused by noise: Evidence in the literature from the past 25 years.* Noise Health, 2004; 6: 5-13.
- Stansfeld, Stephen A. and Matheson, Mark P. *Noise pollution: non-auditory effects on health.* British Medical Bulletin, 2003; 68: 243-257.
- C.D. Francis, J.R. Barber. *A Framework for Understanding Noise Impacts on Wildlife: An urgent Conservation Priority.* August 1, 2013. Boise State University Scholar Works, Department of Biological Sciences.

included in the EIS as appropriate. If the Navy becomes aware of new relevant information that can augment the existing EIS analyses, the EPA requests that the new information be included and discussed in the final EIS. Furthermore, it may also be helpful if the information related to health effects from noise is consolidated into one section in the EIS in order to provide the complete context of the issue.

The EPA appreciates the opportunity to review this DEIS. We would welcome the opportunity to meet with the Navy to discuss our comments in greater detail. If you would like to schedule such a meeting or have questions regarding our comments, please contact Elaine Somers of my staff at 206-553-2966, by email at somers.elaine@epa.gov; or you may contact me at 206-553-2581, or by email at allnutt.david@epa.gov.

Sincerely,

R. David Allnutt, Director
Office of Environmental Review and Assessment

Enclosure: Summary of EPA Rating Definitions

- Shannon, Graeme, et al. *A synthesis of two decades of research documenting the effects of noise on wildlife.* Biological Reviews 91 (2016) 982-1005.

U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.