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)

   citizen, resident
3. **Address** [redacted] Clinton, WA 98236
4. **Email** [redacted]

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

Comments

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

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:

Given the strong and consistent evidence of jet noise on students' academic performance, what is the Navy's proposal for how to mitigate this impact on Coupeville's children?

The Navy needs to reexamine the No Action Alternative and explore other options for operations to be performed at other locations.

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For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Prepared by Coupeville Community Allies
January 18, 2017

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1. **Name** [redacted]

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

3. **Address** [redacted] Coupeville, WA 98239

4. **Email** [redacted]

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Please include any additional comments and concerns here:

As a mother of 4 children, residing near the Coupeville OLF airfield, I am very concerned about the impact the proposed increase in Growlers will have on my children's well-being. We had my daughter in T-ball at Rhododendron Park last spring and had to leave during practice because my daughter was in tears over the loudness and proximity of the growlers ~~during~~ doing their practice. I am concerned about ~~the~~ my children's hearing being damaged while they're playing outside, which in and of itself, would become much more limited if the number of flights were increased at Coupeville OLF. Our animals can't bear the sound of the jets and would have to be indoors most of the time, which isn't ~~[illegible]~~ appropriate for their health and well-being. I'm also very concerned about the impact the Growlers will have on the tourism and agricultural practices that are so vital to the life and well-being of central Whidbey.

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1. **Name** [redacted]
2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military)
   Resident, citizen, business
3. **Address** [redacted] Greenbank 98253
4. **Email** [redacted]

PRIORITY • SAFETY ! SECURITY! SEE →

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

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(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: PRIMARY: SECURITY !! SAFETY !!

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

Please include any additional comments and concerns here:

Whidbey Island is surrounded by water/Puget Sound large barges & ships that can easily bring bombs & other explosions to growlers (ALL of them!) & the whole region - This is a sitting target like Pearl Harbor to have ALL growlers in one spot. Also Bangor is so close w/ its large stockpile of nuclear missiles Also PAINE field is expanding air traffic ALL SECURITY & SAFETY MAJOR ISSUES!

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation Religious Society of Friends, Lopez Medical Clinic

4. City, State, ZIP Lopez Is, 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

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 share your desire to ~~[illegible]~~ keep our country safe. I think we can do that and not make the lives of our residents on Long Island miserable because of the growlers' noise pollution. The emitted noise can be abated.

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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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]

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

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

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

12. Add your own comments here:

We came to Lopez in order to have a quiet, peaceful environment. The Growlers have been very disturbing and we are not pleased.

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1. **Name** [redacted]

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

RESIDENT

3. **Address** [redacted]

4. **Email** [redacted]

COUPEVILLE, WA. 98239

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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.** IMPACT ON EXISTING CONDITIONS HEALTH ISSUES – NOISE / VIBRATION
- [x] **Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.** INCREASE IN TAX BASE FOR SCHOOLS FOR TRANSIT STUDENT POPULATION FUTURE BASE GROWTH . . . . .
- [ ] **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.** FOR BOTH MY PROPERTIES –

(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. — EQUINE IMPACT SYSTEMS FOR OUR HORSES
- ☒ Aquafer and well contamination. — 22 PROJECTED (IN CRASH ZONE!) — TBD — BY TESTING —

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:

ONE THING TO HAVE PRICE FIGHT H'S & PLANES — FEEL THE IMPACT SHOULD BE MITIGATED BY ASSIGNING TO OTHER SITES — THE GROWTH OF PLANES & FLIGHTS — THE FISCAL IMPACT ON PROPERTIES — IN & OUT OF CRASH ZONE + H2O CONTAMINATION SHOULD BE RECOGNIZED & MITIGATED — NO ONE KNEW OF THAT POTENTIAL ON BUYING THE PROPERTY 10-20 YRS AGO — UTILIZE "TRAINING TECHNOLOGY" TO TRAIN W/ NEW SIMULATIONS — 3D ETC —

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1. **Name** [redacted]

2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military) [redacted]
Resident, Farmer, Business owner of

3. **Address** [redacted], Freland

4. **Email** [redacted]

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Please include any additional comments and concerns here:

I am deeply concerned about potential aquifer contamination + the known contamination of private wells near the OLF. Being a farmer, I'm aware of the need to protect the health of our H_2O, air, + soil to produce the amazing product that comes out of Whidbey farms.

Expanded flights increase the chance of future use of flame retardants + more H_2O contamination. This needs to be addressed in the DEIS.

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1. First Name [redacted]

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3. Organization/Affiliation Lopez Island Resident

4. City, State, ZIP Lopez Island Wa 98261

5. E-mail [redacted]

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_____

[redacted]
Port Townsend, WA 98368
February 9, 2017

EA-18G EIS Project Manager
Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: codeEV21/SS 6506
Hampton Blvd.
Norfolk, VA 23508

Sirs:

A look at the Economist Magazine's Pocket World in Figures (2016, p102) tells us that the US spent $596.9bn on arms in 2014: latest figures. This is more that the next highest nine nations, combined. What's more, the US **exported** arms in the amount of $10,194m, which is more than the next three highest nations, combined.

I always believed the grade-school claim that the USA was a peaceful nation. But the above figures suggest that maybe this is not so. I do believe that we should spend enough to have a reasonable defense system. In support of this, I willingly served in the military.

To have adequate military is one thing, but to have a defense budget like ours is over the top. To me, the excess of our military is demonstrated right here in Port Townsend. I understand that the Navy has a designated operational area within reach, but still insists on flying over communities, practicing military maneuvers in parklands, and generally disrupting civilian life in our area.

I am reminded of a time I was on a bus in Mexico. We got pulled over at a road-block, and three heavily-armed soldiers came on the bus. They walked slowly down the aisle, staring at each person, one-by-one. I was really scared.

The not-ignorable roar of a growler going overhead is just another form of military intrusion into our lives. Is this over-reaction? We need to be careful.

I ask that the growlers practice maneuvers in a place other than the Olympic Peninsula, that the growler activity be diverted as much as possible from our communities. Furthermore, I suggest that we have enough growers. Let's not add more.

[redacted]
Port Townsend, WA

Review items organized by category are provided below:

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

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

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

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

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

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

Therefore, it has been impossible for the public to 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,

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

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

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

1. **Name** [redacted]

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

3. **Address** [redacted] Coupeville Wa 98239

4. **Email** _____

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 have significant concerns with the expansion of the growlers @ NAS Whidbey + its impacts on our health + wellness of our 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

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

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

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

1. **Name** [redacted]

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

3. **Address** [redacted] Coupeville WA 98239

4. **Email** _____

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Comments

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(over)

- [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:

- [x] **The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**
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- [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 have great concerns over the safety of our health with the growler expansion.

[redacted]

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

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ENVIRONMENTAL IMPACT STATEMENT FOR THE
EA-18G GROWLER AIRFIELD OPERATIONS AT NAS WHIDBEY ISLAND COMPLEX

COMMENTS

All written comments must be postmarked or received (online) by February 24, 2017, to ensure they become part of the official record.

Thank you for your interest in providing comments on the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island. To be addressed in the Final EIS, comments must be submitted by February 24, 2017. All comments received will be reviewed by the Navy and responded to in the Final EIS.

PLEASE NOTE: Personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless required by law. The city, state, and 5-digit zip code of individuals who provide comments may be released.

First Name: [redacted]

Last Name:

Agency/Organization:

City/Municipality: Coupeville

State/Province: select... WA

Zip/Postal Code: 98239

Comments: ATTACHED

Would you like to join the mailing list for future updates? [You will be redirected to the mailing list form upon submit]

Privacy Advisory: Please refer to the Privacy Policy that describes why this information is being collected and how it will be used.

Submit

Written comments may be mailed to:

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

This is an official U.S. Navy web site.

The United States Fleet Forces Command is the official sponsor of this project website. Questions regarding its content may be directed to the Public Affairs Officer, Mr. Ted Brown, at (757) 836-4427.

COMMENTS ON THE ENVIRONMENTAL IMPACT STATEMENT FOR EA-18G "GROWLER"AIRFIELD OPERATIONS AT NAVAL AIR STATION WHIDBEY ISLAND COMPLEX VOLUME 1 AND 2

February 20, 2017

[redacted]

My name is [redacted]. I have a home located in the Admirals Cove community at [redacted] on the southeast end of the OLF Coupeville, Washington field. Figure 1 below shows the location of Admirals Cove as it relates to Figure 4-3-1 of the EIS report. As you can see, the community where I live is under the direct path of the "touch and go" operation at OLF Coupeville. I am a member of the Navy League and am not associated with Citizens of Ebey's Reserve (COER).

Figure 1. Copy of EIS Volume 1 Figure 4.3-1 Showing the Location of Admirals Cove Relative to APZ-1 for the OPF Coupeville field.

Figure 4.3-1 Existing 2005 AICUZ Clear Zones and Conceptual APZs for OLF Coupeville, Option 1

My family and I have experienced the noise impact during the Navy's Carrier Landing Practice (FCLP) operations for the past 15 years. Many flights are directly over our home at low altitudes (less then 350 feet). When the jets are flying, the house and our bodies reverberate from the noise levels. It is impossible to have any conversations either indoor or outdoor. It was impossible for our daughter to sleep during weeknight evening flights that occur regularly near or after midnight for several consecutive nights. The proposed maximum 10-fold increase in flights over our property will make it nearly impossible to live in our home. It is important to note that the Navy appears to have nearly suspended flights at the OLF during the EIS comment period. My family and I are also concerned about living in a potential aircraft crash zone.

I reviewed the Navy's EIS based on my experience as a licensed Certified Geological Engineer who has been responsible for preparation and review of numerous EIS documents, and as a work site noise safety officer. The noise and potential crash risk associated with the proposed increase in FCLPs will result in irreversible negative impacts on health and safety that are not addressed in the EIS.

I believe the EIS contains numerous, significant deficiencies, and substantial additional work is necessary to meet the minimum standards for an EIS of this nature. Specifically, the EIS:

1. Fails to establish an Air Installation Compatible Use Zone (AICUZ) and an Accident Potential Zone (APZ) for OLF Coupeville.
2. Does not define the actual noise level health and safety impacts on existing residences in the direct path of the landing operations.
3. Does not define the actual potential of aircraft crash risk specific to residences in the direct path of the landing operations.

I provide documentation and additional information about each of these three deficiencies below.

1. Need to Establish AICUZ and APZ for the OLF Coupeville Field

The establishment of an AICUZ and APZ for Navy airfields is essential to define safe noise levels and potential crash zones for various land uses. It is my understanding that the establishment of an APZ is only done when annual flights exceed 5,000. There are two major mistakes in the EIS for the OLF Coupeville in relation to AICUZ and APZ: 1) using an outdated finding from the 2005 AICUZ process to justify not establishing an AICUZ and APZ, and 2) deferring the establishment of AICUZ and APZ until after the EIS process is complete. See direct quotes from the EIS below:

(EIS Page 4-116, Paragraph 4)
"At OLF Coupeville, it was determined during the 2005 AICUZ process that additional APZ coverage was not warranted at that time because operational numbers were below the threshold (approximately 5,000 operations per approach or departure flight track) for the establishment of APZs at that location."

(EIS Page ES-5 and ES-6)
"Conceptual APZs are presented for the purpose of analyzing potential land use impacts of the Proposed Action. At this time, no decision has been made with regard to additional APZs. The Navy

will perform an AICUZ update upon completion of this EIS and share official recommendations with the community."

All of the FCLP total aircraft operations shown in EIS Table 4.1-5 exceed the 5,000 threshold for establishing an APZ for the OLF Coupeville field. The 2005 AICUZ conditions are no longer applicable to OLF existing and proposed flight operating conditions. Therefore, an APZ should be established for OLF Coupeville, just as an APZ was established for Ault Field.

The EIS provides conceptual APZ zoning for the OLF Coupeville shown on Figure 1 above. There are more than 500 residences (more than 1,000 people) that are clearly located in the conceptual APZ-1 zone. The Navy's own rules requires a AICUZ and APZ for the OLF Coupeville facilities based on the current FCLPs, even before considering additional operations associated with the EIS.

2. Actual Noise Level Health and Safety Impacts

The average year noise exposure levels contour maps for the community of Admirals Cove does not match what residents in the community experience. The EIS Representative Points of Interest (RPOI) RO6 (in the middle of Admirals Cove) shows maximum sound exposure levels from 118 to 121 dB, as shown below.

Table 4.2-3 Maximum Sound Exposure Level (dB) and Maximum Sound Level (dB) for Representative Points of Interest in the Vicinity of the NAS Whidbey Island Complex, Alternative 1 (Average Year)[1]

		Maximum SEL (dB)		L_{max} (dB)		Number of Annual Events[2]			
ID	Description	No Action Alternative	Alt 1	No Action Alternative	Alt 1	No Action Alternative	Alt 1 A	Alt 1 B	Alt 1 C
Residences									
RO6	Admirals Dr and Byrd Dr	118	121 (+3)	114	118 (+4)	267	2,650 (+2,383)	1,613 (+1,346)	649 (+382)

In EIS Table 4.2-3, the noise Maximum SEL (dB) and L_{max} (dB) values for the No Action Alternative are 118 and 114. For Alternative 1 the levels are and 121 and 118. These values are significantly exceeding the levels reported in the EIS Figure 3.2-5. In Figure 3.2-5, the reported DNL noise level is 75 dB. I have noted the location of the Admirals Cove community in EIS Figure 3.2-5 below. Figure 3.2-5 misrepresents the actual noise levels, as noted in the EIS Table 4.2-3. **The model being used conflicts with actual measurements conducted by the Navy.**

Figure 3.2-5 No Action Environment for OLF Coupeville, NAS Whidbey Island Complex

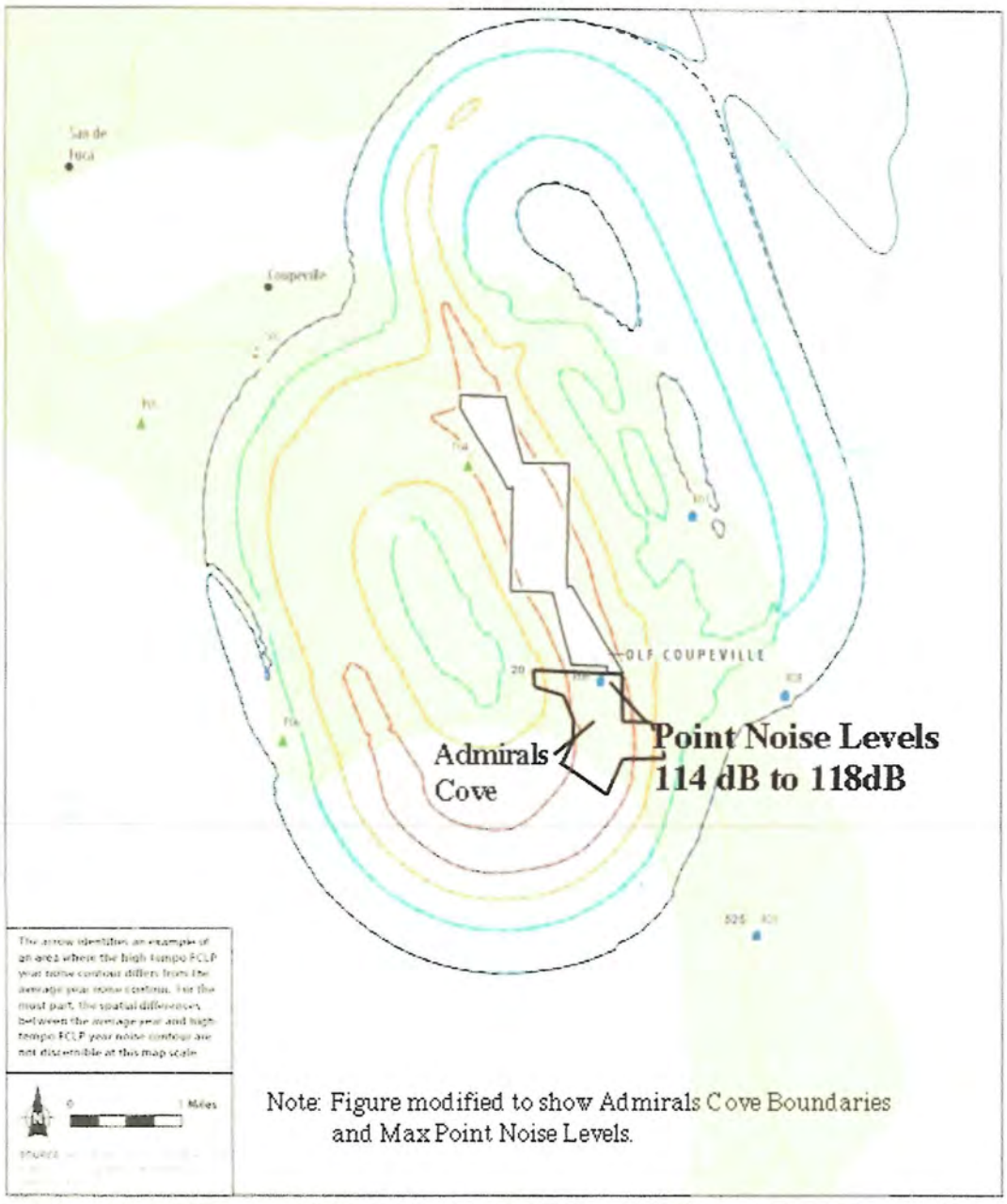

Figure 3.2-5
No Action Environment for
OLF Coupeville, NAS Whidbey Island Complex
Whidbey Island, Island County, WA

What Is The Health Risk?

Table 1-1 provides maximum noise exposure levels and duration of exposure that no worker should equal or exceed.[1] The maximum noise exposure level and duration for 118 dB and 114 dB is 14 and 15 seconds, respectively, for No Action Alternative. The maximum noise exposure level and duration for 121 dB and 118 dB is 7 and 14 seconds, respectively, for Alternative 1.

Table 1-1. Combinations of noise exposure levels and durations that no worker exposure shall equal or exceed

Exposure level, L (dBA)	Duration, T Hours	Minutes	Seconds	Exposure level, L (dBA)	Duration, T Hours	Minutes	Seconds
80	25	24		106		3	45
81	20	10		107		2	59
82	16			108		2	22
83	12	42		109		1	53
84	10	5		110		1	29
85	8			111		1	11
86	6	21		112			56
87	5	2		113			45
88	4			114			35
89	3	10		115			28
90	2	31		116			22
91	2			117			18
92	1	35		118			14
93	1	16		119			11
94	1			120			9
95		47	37	121			7
96		37	48	122			6
97		30		123			4
98		23	49	124			3
99		18	59	125			3
100		15		126			2
101		11	54	127			1
102		9	27	128			1
103		7	30	129			1
104		5	57	130–140			<1
105		4	43				

[2]

Based on my direct observation for the past 15 years, a typical FCLP event consists of a single daylight period of 2 hours during the daytime and another 2-hour event period near midnight. During any 2-hour period, aircraft pass over my home about every 5 minutes for a total of 24 fly-overs every 2 hours, and a total of 48 for a FCLP per day. My best estimate is that we are exposed to the maximum noise level for approximately 20 seconds per fly over. This means residents in Admirals Cove are exposed to the maximum noise levels an estimated 16 minutes per FCLP day. This poses a serious health risk.

[1] U.S. Department of Health and Human Services, 1998, Criteria For A Recommended Standard: Occupational Noise Exposure, Revised Criteria 1998, June.

[2] U.S. Department of Health and Human Services, 1998, Criteria For A Recommended Standard: Occupational Noise Exposure, Revised Criteria 1998, June.

The EIS uses a model, not direct measurements, to determine that the impact is 70dB. This is not supported by the facts, and there is no specification in the EIS regarding the assumptions that were used to develop the model. Actual data about the maximum noise level exposure and duration is needed for an acceptable EIS. Directly measuring noise created by the jets for the individuals who reside directly under the flight path is simple and inexpensive. Why has this not been done?

The EIS refers to the 2005 report to discuss compatibility with land use, but only does so for Ault Field. The EIS does not discuss how the Navy's AICUZ standards applies to OLF Coupeville. Furthermore, the EIS does not provide a table of land use classifications and compatibility guidelines, as has been done for other Naval Air Stations. For example, this analysis was done for Naval Station Norfolk Chambers Field[3] (see Navy Table 6-1 below).

Table 6-1
Land Use Classifications and Compatibility Guidelines

	Land Use Compatibility with Noise Zone (DNL)						Land Use Compatibility with APZs		
	Noise Zone 1		Noise Zone 2		Noise Zone 3		Clear Zone	APZ I	APZ II
	<55	55-64	65-69	70-74	75-79	>80			
Single Family Residential									(1)
Multi-Family Residential, Transient Lodging									
Public Assembly									
Schools and Hospitals			(2)	(2)					
Manufacturing (ex. Petrol/chem ; textile)									
Parks								(4)	(4)
Business Services				(2)	(2)			(3)	(3)
Agriculture, Forestry and Mining									

Source: Adapted from OPNAVINST 11010.36C

Notes
This generalized land-use table provides an overview of recommended land use. To determine specific land-use compatibility, see Appendix B.
(1) = Maximum density of 1-2 dwellings per acre.
(2) = Land use and related structures generally compatible however, measures to achieve recommended noise- level reduction should be incorporated into design and construction of the structures.
(3) = Maximum Floor Area Ratio that limit people density may apply
(4) = Facilities must be low intensity

Key
Compatible
Incompatible

According to the Navy's EIS DNL noise level of 75 dB reported for the OLF Coupeville, the Admirals Cove residential community land use is "incompatible" with the proposed FCLPs.

[3] U.S. Department of the Navy, 2009, Air Installations Compatible Use Zones Study for Naval Station Norfolk Chambers Field, Norfolk, Virginia, 2009.

This begs the question: Was the decision to defer the establishment of an AICUZ APZ Zone made because the Navy knew this would disqualify the proposed additional FCLP plans?

By not defining specific APZ zoning for OLF Coupeville, the EIS does not accurately assess the impact and risk to the Admiral's Cove subdivision from potential air crashes from the proposed increase in flights over this community of over 500 residences. The EIS also dismisses the risk or any mitigation of risk based on the following EIS statement:

> (EIS Page ES-5 & 6)
> "Public Health and Safety. Increased operations increase the potential for flight incidents and bird-animal aircraft strike hazard, but existing management strategies would manage risk. Scenarios with high numbers of operations at OLF Coupeville may require the development of Accident Potential Zones (APZs) through the Air Installation Compatible Use Zone (AICUZ) update process, including Alternative 1, Scenario A; Alternative 1, Scenario B; Alternative 2, Scenario A; Alternative 2, Scenario B; Alternative 3, Scenario A; and Alternative 3, Scenario B. Conceptual APZs are presented for the purpose of analyzing potential land use impacts of the Proposed Action. At this time, no decision has been made with regard to additional APZs. **The Navy will perform an AICUZ update upon completion of this EIS and share official recommendations with the community**."

It is not acceptable to defer establishment of APZs for the OLF Coupeville field based on the FCLP's shown in Table 4.1-5. The establishment of an APZ is an essential requirement of this EIS study.

Relative to commercial airline operations, the F-18 series aircraft has a high incidence of significant flight accidents. The EIS provides an extensive discussion on Navy flight safety training and procedures, but does not provide any estimate of the potential crash risk for the additional proposed FCLPs that could increase from 6,500 to 35,500. What is the estimated crash risk for those in the direct flight path?

Admirals Cove Lake is located within the conceptual APZ-1 zone for OLF Coupeville. Admirals Cove Lake is a 12-acre recreation and retention pond in the Admirals Cove subdivision. The lake is a major migratory resting pond for Canadian geese that typically has several hundred geese on the lake. The lake is also home to bald eagles, gulls, and numerous species of ducks. All of these birds are in the direct path and at altitudes of the touch and go flights for OLF Coupeville. The potential of bird air strikes represents a clear and present danger to proposed FCLPs at the OLF Coupeville.

SUMMARY

The EIS for proposed additional FCLP's will result in irreversible impacts on the residents of Admirals Cove. Critical impacts are as follows:

1. AICUZ and APZ zones need to be established for OLF Coupeville.
2. The noise model used in the EIS directly conflicts with noise measurements made by the Navy for Admirals Cove. The model being used incorrectly

under-estimates the actual noise being experienced.

3. The noise level and duration experienced by those living under the direct flight path (including Admirals Cove) will exceed maximum allowable levels of over 121 dB. These noise levels and duration exceed U.S. Department of Health and Human Services safe noise level exposure standards.
4. Failure to establish AICUZs and APZs for the OLF Coupeville for the proposed FCLPs until the EIS process is complete will result in an automatic land use conflict of interest. Knowing a proposed land use is incompatible with existing land uses is not acceptable for an EIS analysis.

[redacted]

[redacted] 2/20/2017

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation _____

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

5. E-mail [redacted]

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

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

I am opposed to all Growler activity but if they must fly over our San Juan islands, please use measures that accurately evaluate the effects on humans and marine wildlife.

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** [redacted]

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

citizen of the United States of America

3. **Address** [redacted] 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)

- ☑ **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 occurs, 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 dont 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

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.

Prepared and paid for by Coupeville Community Allies

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January, 2017 Comments

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4. City, State, ZIP LOPEZ ISLAND WA 98261

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_____

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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 AA.M.. DETAILS SHOULD INCLUDE TYPES OF AIRCRAFT, TIME AND PLACE 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

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] OAK HARBOR, WA. 98277

4. Email [redacted]

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(over)

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- ☑ Noise impacts on commercial properties including agriculture.
- ☑ Aquafer and well contamination.

Additional Concerns:

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

Please include any additional comments and concerns here:

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 un 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 must have balance. We are too populated an island + not just with Navy. Please Keep size as it is or relocate these Growlers. Thank you.

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Prepared by Coupeville Community Allies

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

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[redacted]

3. **Address** [redacted] COUPEVILLE, WA. 98239

4. **Email** [redacted]

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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 community, as it becomes clearer about increased flight opperations, is starting to lose it's 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 value of my veterinary practice that I've put my whole life into is at risk. This is breaking this community's heart. The Navy could put these flight operations elsewhere + that's true. [redacted]

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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 can not 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, convelescent center, etc. The list goes on and on. The noise is unbearable and our community is being assauted left and right. Either leave the practices as they are or go somewhere else. There are options. Our lives and retirements are invested in our property

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I am a 25+ year ~~[illegible]~~ resident of Whidbey Island. Also a business owner. Our entire livlihood and retirement + savings via land is tied up here. What is being proposed here will be devastating to the welfare and livlihoods 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 folks homes, parks, land trails, transit stations, etc. These increases in growler operations do not belong here. Leave practices as they are or locate somewhere else if need be. Leave maintanence here. 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 here. Please consider alternate locations. Thank you!

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

3. **Address** [redacted] OAK HARBOR, WA. 98277

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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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3. **Address** [redacted] Seattle, Wa

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I grew up just outside of Coupeville and hope to return some day. My parents still live there 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 - Ebey's Reserve + Central Whidbey is too special to be ruined !!! Please Listen !!!

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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,

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 era 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 your sent a letter too 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?

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

[redacted]
Port Townsend, WA 98368
[redacted]

2/8/2017

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.

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 Lvevel (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 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

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 Kwiaht 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.

[redacted]
Lopez Island, WA 98261

References:

1) www.quietskies.info
2) www.whidbeyeis.com/publicinvolvment.aspx
3) http://sjcgis/aircraft-noise-reporting/
4) http://citizensofebeysreserve.com/references/files/JGLNoiseReport.pdf

(Appendix)

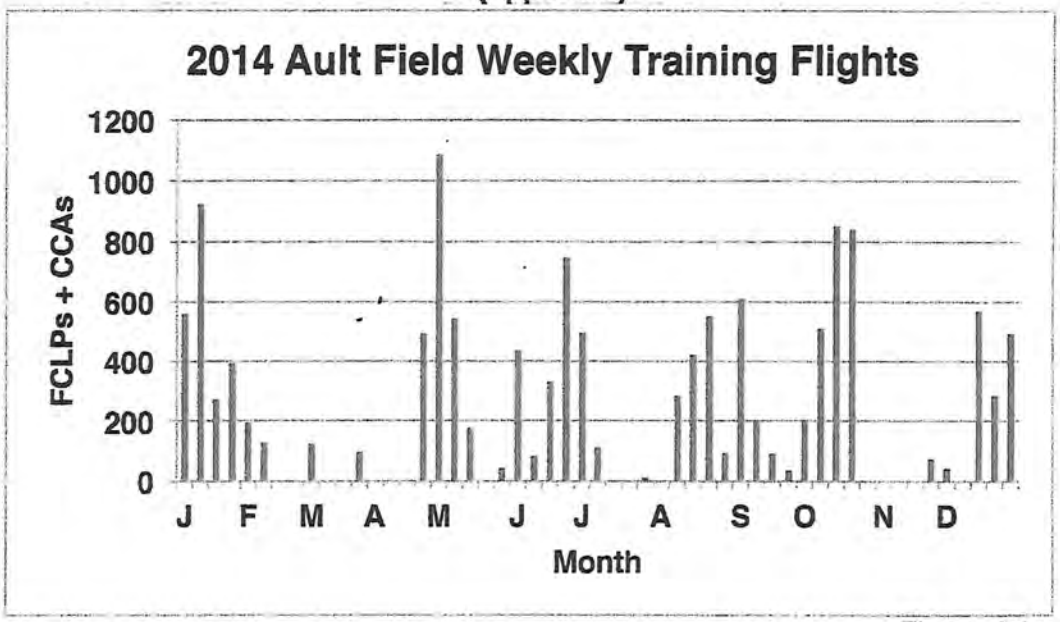

Figure 4.1

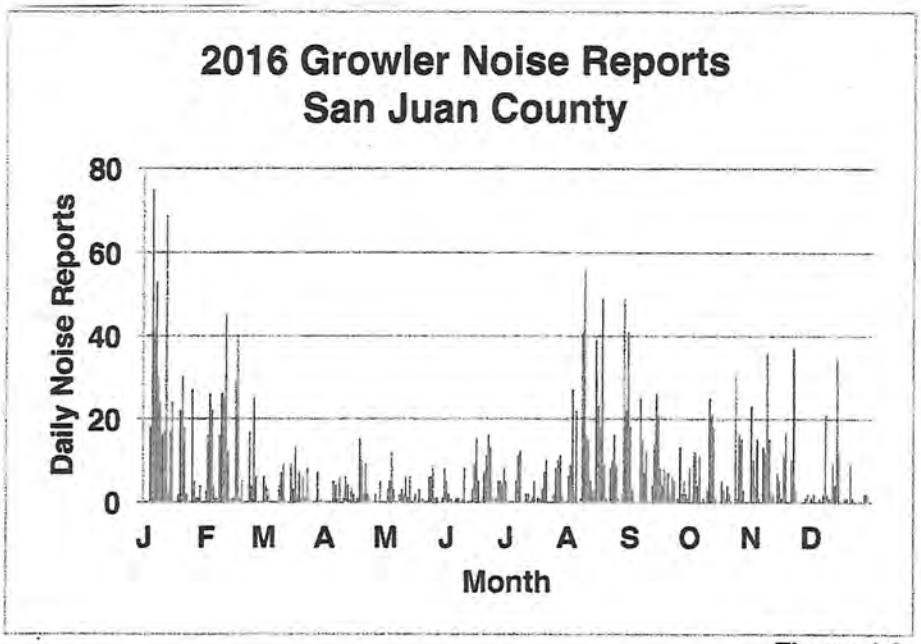

Figure 4.2

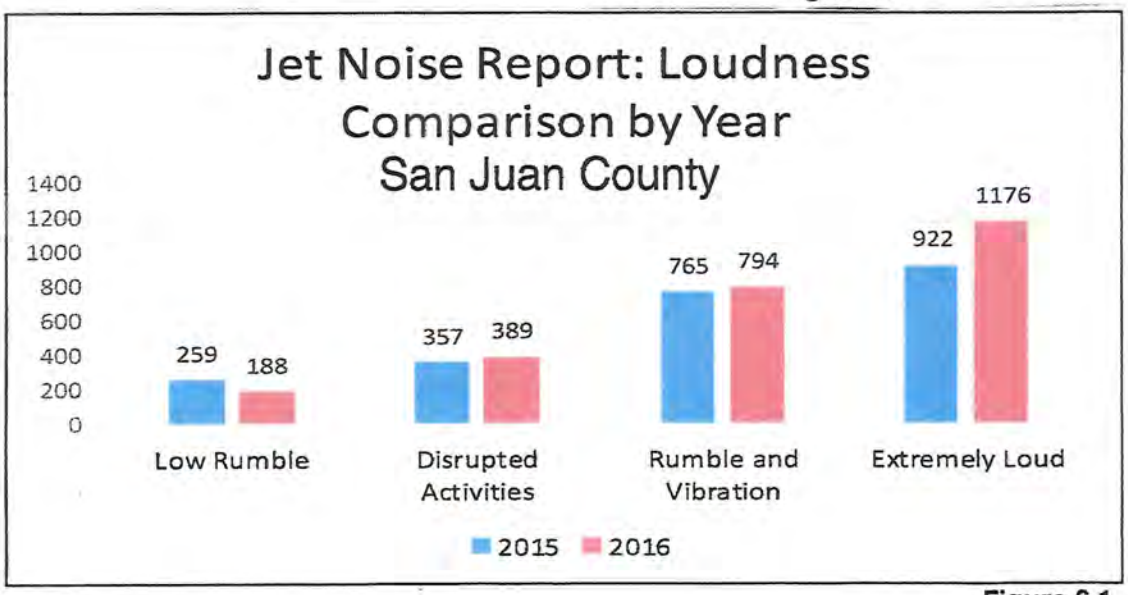

Figure 6.1

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

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

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

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

1. **Name** [redacted]

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

   Resident - Parent

3. **Address** [redacted] Coupeville, WA 98239

4. **Email** [redacted]

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

Comments

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

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

- [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.**

(over)

- [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:

- [x] 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.
- [x] 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 schoolers), recreation areas (State, national, County, and town parks), and water contamination, all of which will impact ~~may~~ 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

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

Prepared by Coupeville Community Allies
January 18, 2017

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

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

1. **Name** [redacted]

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

   resident

3. **Address** [redacted]

4. **Email** [redacted]

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

Comments

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

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

- [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.**

(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:

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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Prepared by Coupeville Community Allies
January 18, 2017

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 propionate 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]

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

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

Online at: www.whidbeyeis.com

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

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

1. **Name** [redacted]

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

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)

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: _____

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

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation _____

4. City, State, ZIP LOPEZ ISLAND WA 98261

5. E-mail [redacted]

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

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

_____

_____

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_____

_____

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

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

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

1. **Name** [redacted]

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

3. **Address** [redacted] Coupeville Wa

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)

☑ Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.

☑ Noise impacts on commercial properties including agriculture.

☑ Aquafer and well contamination.

Additional Concerns:

☑ The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.

☑ The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.

☐ The impact on marine and terrestrial wildlife.

☐ The major security risk for Whidbey Island by siting all Growlers here.

☐ Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

My main concern is the constant noise that would result from increased flights. The Navy's noise ~~modeling~~ averages does not accurately ~~measure~~ reflect the actual noise experienced "in the minute" as the growler flies overhead. Conversations stop (impacting personal, social + business communications) 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~~ The noise + the distraction impacts ~~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 c̄ the increased flight projections. Regarding scenarios A B C I would opt for no inc in flights at OLF

— None of the above

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Prepared by Coupeville Community Allies

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

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

3. **Address** [redacted] Coupeville, Wa 98239

4. **Email** [redacted]

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(over)

- [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:

- [ ] **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.**
- [x] **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:

Have you taken consideration, on assisting families in testing the wells specificly the Flduirals Community and the Navy Housing areas.

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- [ ] The impact on marine and terrestrial wildlife.
- [x] 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:

Have you taken into consideration alternatives to help families living under the flying zone. to help decrease the noise level. — Specificly the Admirals Cove & Military housing — as well as the School areas in Coupeville & Oak Harbo?
Examples. Upgrade windows, additional insulation (under & Attics) as well as paint.

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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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 accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

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

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

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

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

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to 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]

Port Angeles, CA 98362

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

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

[redacted]

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Prepared by Coupeville Community Allies
January 18, 2017

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

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

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

1. **Name** [redacted]

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

Private citizen; resident of Coupeville; Navy supporter, but ... read on ...

3. **Address** [redacted], Coupeville, WA 98239-0493

4. **Email** Ø

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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- ☒ **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.

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 1½ 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, the house shook (as in, too close!!) 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 a rural, contemplative setting). (Provide citizens our protection, anyone?) Please.

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

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.

Prepared and paid for by Coupeville Community Allies

Jan. 25, 2017

EA-18G EIS Project Manager
Naval Facilities Engineering
Command (NAVFAC) Atlantic

Attn: Code EV21/SS
6506 Hampton Blvd.
Norfolk, Va 23508

Abused Citizen of the Puget Sound Area

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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 misconstruction 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]
[redacted]
LaConner, WA 98257-8927
[redacted]

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 Tidalgo Island
Swinomish Indian Reservation

. 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.

[redacted]
La Conner, WA 98257-8927
[redacted]

Would appreciate a reply

Jan. 25, 2017
EA-18E EIS Project Manager
Naval Facilities Engineering Command (NAVFAC) Atlantic
Attn: Code EV21/SS
6506 Hampton Blvd.
Norfolk, VA 23508

Abused Citizen of Fidalgo Isld. Skagit 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 21st century off-Whidbey site

your reply will be appreciated

[redacted]
La Conner, WA 98257-8827
[redacted]

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

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

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

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

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

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

Therefore, it has been impossible for the public to 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,"

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Thank you for considering these comments.
Sincerely,

Port Townsend WA 98368

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

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

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

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

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

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

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to 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,

[redacted]
PORT TOWNSEND, WA 98368

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation _____

4. City, State, ZIP LOPEZ ISLAND WA 98261

5. E-mail [redacted]

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

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

I support all of these actions recommended. The impact of these airplanes on our lives here in the islands is unbelieveably intense. The weapon of fierce sound is being used against our own citizens. These airplanes should only fly over deserts and low population areas.

[redacted]

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

January, 2017 Comments

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

1. First Name [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 ☑ if you would NOT like to be on the mailing list

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12. Add your own comments here:

_____

_____

_____

_____

_____

_____

_____

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

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

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

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

1. **Name** [redacted]

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

   resident, citizen

3. **Address** [redacted] Coupeville, WA 98239

4. **Email** [redacted]

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

Comments

Please check all that concern you and 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:

There 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

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

Prepared by Coupeville Community Allies
January 18, 2017

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

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

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(over)

- [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.**
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- [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:

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 draft EIS report. Also, the contamination of water supply makes the whole location of the Growler training absolutely unconscionable. [redacted]

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

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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.

FROM: [redacted]
LANGLEY, WA 98260

DATE
02/06/17

To: 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 1970s I lived on Burchell 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 decibals that residents experience is incorrect as it represents an average - which includes non-flying days and thus lowers the decibals by over half - from 115 to 55.

As a psychologist, the neurok, 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,

[redacted]

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

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

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

1. **Name** [redacted]

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

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:

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.*

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Environmental Impact Statement Comment Form

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

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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, WA

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):

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

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Prepared by Coupeville Community Allies

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 none

3. Address [redacted] Langley, WA 98260

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 Coupeville 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 people's concern, anger & frustration - so it would just b

Please print • Additional room is provided on back

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

Naval Facilities Engineering Command Atlantic

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

YOUR INPUT MATTERS

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

For more information, please visit the project website at ***whidbeyeis.com***

Please print

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Naval Facilities Engineering Command Atlantic

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

YOUR INPUT MATTERS

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Whidbey 2016_Comment Sheet.ai-GRA-6/23/16

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like to offer suggestions for Alternatives to your current plans —

1. Consider you perform + practice many of your flights East of the mountains at Naval Base in Idaho — & then when your pilots have had enough practice they could accomplish their Final Test flights at the Coupeville Touch Down field —? this would be a Compromise reduce the Growler Impact in Coupeville & 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 continue delivering toxified water to families in perpetuity? Please you don't want to permanently HARM (Poison the water) of one of the only remaining prairies in the United States Please Please a FLINT, Michigan situation on your hands in a TOURIST destination, highly valued AGRICULTURAL area — ???

3. My 3rd comment is one based upon our NATIONAL Security — why would the NAVY Conduct All of it's Electro magnetic warfare in one place? The Olympic Peninsula

For more information, please visit the project website at **whidbeyeis.com**

Please print

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

YOUR INPUT MATTERS

insula must not be the only place on the West or East Coast that is desireable for this type of testing — Maybe spread out some of the testing and therefore reduce the impact in one area?

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

Thankyou for your attention [redacted]
to my suggestions!

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

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

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

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

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

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

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville *alone* went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact."

The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability.

4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water.

5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential

impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews."

6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts.

7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." (https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities.

8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative.

9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and

training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula.

10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas.

11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense.

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

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

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

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

16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: https://www.fs.usda.gov/project/?project=42759). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control.

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

18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets.

19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to *not* allow a comment period on the Final EIS would be unlawful.

20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period.

21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable.

22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can

claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant.

23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals. (https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf)

24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water.

25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process.

Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted.

26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly *likely* that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area.

27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the *best available science*. This DEIS fails that test.

Thank you for considering these comments.
Sincerely,

[redacted]
Nordland WA 98358

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:

[redacted]
Coupeville, WA 98239

[redacted]
Coupeville, WA 98239

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name _____

2. Last Name _____

3. Organization/Affiliation _____

4. City, State, ZIP _____

5. E-mail _____

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

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

_____

_____

_____

_____

_____

_____

_____

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,

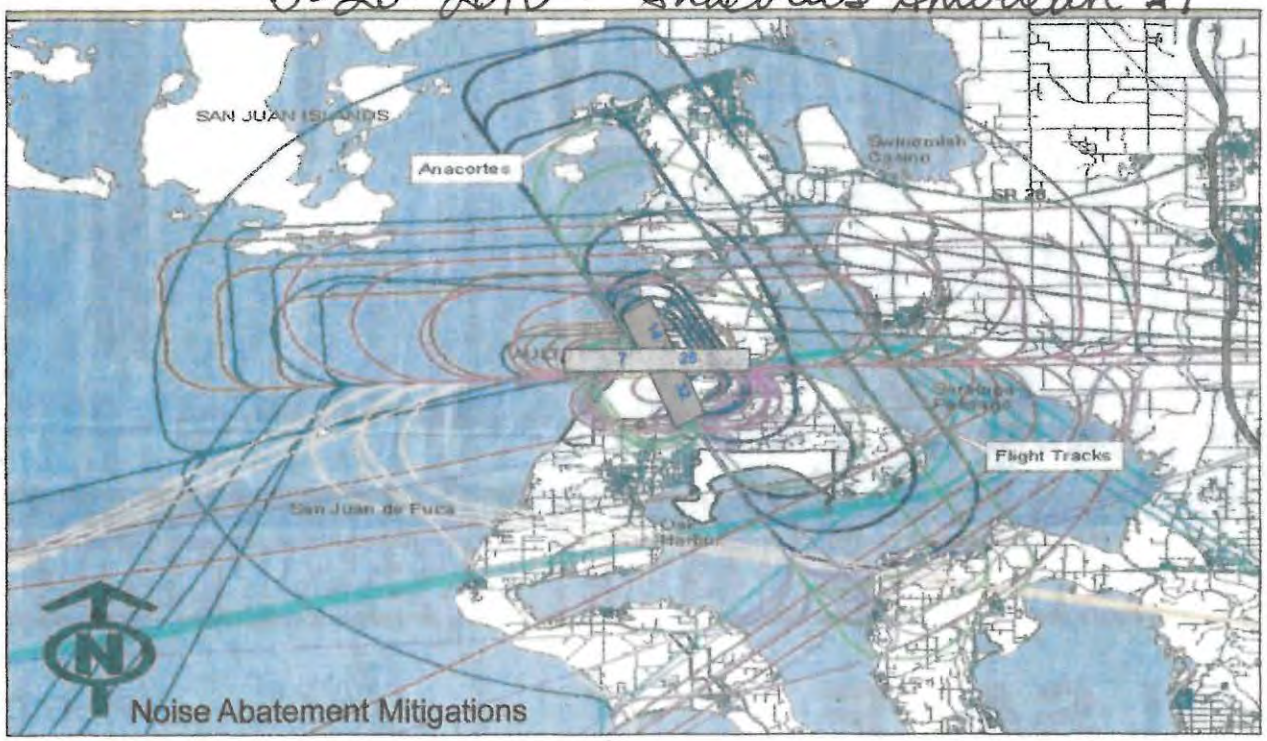
[redacted]

Anacortes, WA 98221

Attachment 1 flight path map

Attachment 1 Flight Path Map

5-20-2015 Anacortes American A7



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).

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

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 homeowner - S. end of Lopez Island

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

5. E-mail _____

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

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

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January, 2017 Comments

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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 agree with the requests that have been made. Thank you for completing this project.

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

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

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

1. **Name** [redacted]

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

   resident, citizen

3. **Address** [redacted]

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.** Use actuals, not modeling
- ☑ **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.** 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 FY18 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

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

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

1. **Name** [redacted]

2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military)
CITIZEN; RESIDENT (home directly under flight landing path, OLF)

3. **Address** [redacted]
COUPEVILLE, WA — 98239

4. **Email** _____

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(over)

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Prepared by Coupeville Community Allies

[redacted]
Coupeville, WA 98239
[redacted]

February 17, 2017

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

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

Dear Sir or Madam:

Thank you for extending the public comment period for the subject draft Environmental Impact Statement (the "DEIS"). Such an extension is warranted by the technical complexity and length of the document, which considerably exceeds the length set forth in the governing regulations (40 CFR 1502.7).

I reside on Smith Prairie on central Whidbey Island within Ebey's Landing National Historical Reserve. I have lived in my present home, located within one mile of the runway at Outlying Field Coupeville (the"OLF"), since 1981. My comments are as follows:

1. The DEIS examines and attempts to quantify effects on a plethora of environmental parameters arising from expanded flight operations at Naval Air Station Whidbey Island ("NASWI"). It is, however, unrealistic to look at these effects individually, when the overall result of the proposed action will be a change in the fundamental character of central Whidbey Island, which is recognized for its rural ambience and links to history:

> "Ebey's Reserve is a national model for sustainable development in rural communities. It is the only remaining area in the Puget Sound region where a broad spectrum of Northwest history is clearly visible on the land, and protected within a landscape that is lived in and actively farmed. It is a place that is sustained using contemporary conservation strategies, local stewardship, and by leaving the land in primarily private ownership, while preserving its historic, cultural, and rural character." (Pickard, Jan and Mark Preiss, Ebey's Landing National Historical Reserve

Trust Board, in Dept. of the Interior National Park Service et al., *Ebey's Landing National Historical Reserve Long-Range Interpretive Plan*, September 2009.)

Applicable Federal regulations require that aesthetic, cultural, and social effects, "whether direct, indirect, or cumulative" be considered in an EIS (40 CFR 1508.8). It is therefore necessary to look beyond the tables of statistics and consider the qualitative change that will occur in this historically quiet, rural community if the frequency of operations at OLF is increased up to five- to six-fold over the present level (as in proposed Scenario A). Friends of mine, who are long-term residents of this area, have already moved away or are making plans to do so in anticipation of expanded flight operations at OLF. The final EIS must also consider the cumulative effects of the proposed action on health, student learning, land use, property values, tourism, etc. and how those changes will shape Coupeville and the surrounding community.

2. The DEIS lacks objectivity; it appears to have been crafted to rationalize the Navy's stated preference (DEIS at page ES-3) for conducting the majority of FCLPs at OLF. Coupeville Middle/High School and Whidbey Health are omitted as points of interest. It is also telling that the Rhododendron Park ball fields, dog park, and campground, as well as Ebey's Landing National Historical Reserve receive no mention in the discussion on recreation areas at page ES-7, a discussion that does single out effects on recreation areas in the vicinity of Ault Field.

3. Section 3.14.2.3 Seismic Activity fails to describe major seismic events along the Cascadia Subduction Zone, the most recent of which is believed to have occurred in 1700. Evidence for the 1700 earthquake, estimated at magnitude 9, is presented in Atwater, Brian F. et al., *The Orphan Tsunami of 1700: Japanese Clues to a Parent Earthquake in North America*, 2nd ed., United States Geological Survey and University of Washington Press, 2015. The statement, "The most recent apparent significant activity was approximately 18,000 years ago" (EIS at 3-187) is therefore incorrect and not based on best available science. Seven Cascadia Fault earthquakes have occurred in the last 3,500 years, with an average interval of about 500 years between events (Atwater et al., *ibid*., and references cited therein). It is estimated that there is a one-in-ten chance of such a major quake (up to magnitude 9) occurring in the next 50 years. Such an event would be "the costliest, and potentially deadliest, natural disaster in US history" acording to the Washington State Emergency Management Division (*Seattle Times*, January 27, 2017). I find it disturbing that the Navy has failed to address this risk in the DEIS, but am hopeful that this is merely an oversight and that appropriate emergency plans exist.

   Section 3.14.2.3 correctly states, "Seismic activity in this region results from subduction of the Juan de Fuca plate beneath North America." However, this is the sole mention of subduction zone earthquakes and it is presented within a discussion of other types of faults, thereby conflating two very different classes of risk. The Strawberry Point, Devil's

Mountain, and Utsalady Faults are believed to be oblique-slip, transpressional faults. Evidence indicates that these faults have been active much more recently than 18,000 years ago and that such activity may have resulted in tsunamis affecting north Whidbey Island as recently as 1160 years B.P. (Johnson, Samuel Y. et al., *Active Tectonics of the Devils Mountain Fault and Related Structures, Northern Puget Lowland and Eastern Strait of Juan de Fuca Region, Pacific Northwest*, USGS Professional Paper 1643, 2003. https://pubs.usgs.gov/pp/p1643/). The EIS should be revised (a) to discuss seismic risks associated with the Cascadia Subduction Zone; (b) to correctly identify other seismic risks based on current science; (c) to distinguish between seismic risks arising from the Cascadia Subduction Zone and those arising from other, more local faults; and (d) to present plans for management/mitigation of seismic risks.

4. The risk of a major earthquake in the foreseeable future calls into question the decision to base all Growlers at NAS Whidbey (DEIS at ES-2). A major, subduction-zone earthquake in the Puget Sound basin would be characterized by an extended period of ground shaking (measured in minutes), soil liquefaction[1], and ground subsidence, causing major structural damage to runways and other infrastruture. See, Atwater et al., ibid. An earthquake of such magnitude, occurring without warning, could leave much of the Navy's Growler fleet grounded. In view of seismic risk alone, alternative basing sites for at least a portion of the Growler fleet should be given more serious consideration.

5. Ault Field receives its water from the City of Anacortes via pipes on the Deception Pass bridge (DEIS at 3-179 to 3-180), which was built in the early 1930s. The Deception Pass bridge is in need of a seismic retrofit (*Seattle Times*, ibid.). A major earthquake as discussed in comment 3, above, would likely damage the bridge and disrupt the water supply to Ault Field (and Oak Harbor/northern Whidbey Island) for an extended period. Ault Field has water storage equal to less than eight days of consumption (DEIS at 3-180), and such storage would also likely be damaged. The risk of an extended interruption of the water supply further calls into question the decision to base all Growlers at NAS Whidbey. In addition, the Navy should consider steps to safeguard its water supply against earthquake risks, such as supporting a seismic retrofit of the bridge and water pipes, and increasing storage capacity.

6. The DEIS states, "OLF Coupeville is available for use 7 days per week, 24 hours per day, although in recent years operations at OLF Coupeville have not been conducted on weekends." (Page 3-11.) Will the historical pattern of no weekend use be honored, or will FCLP operations be conducted at OLF seven days per week? Will operations be conducted around the clock? This is particularly significant given the importance of tourism to the local economy. The final EIS should disclose the contemplated weekly

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[1] Ground underlying Ault Field consists of unconsolidated sediments of glacial and other origin (Dragovich, Joe D. et al., *Geologic Map of Northwest Washington—Northwest Quadrant*, Washington Division of Geology and Earth Resources Geologic Map GM-50, 2002).

use of OLF Coupeville, and should discuss the economic effects of such use as well as what steps will be taken to mitigate the impact.

7. According to the DEIS (p. 3-179), "Island County has 229 public water systems serving over 78,000 individuals." This statement is incorrect. According to Douglas J. Kelly, Island County Hydrogeologist (pers. comm., 2017), Island County has 284 Group A water systems and 590 Group B water systems, for a total of 874 systems. In addition, there are 450 two-party systems. The EIS should be revised to include correct data on public water systems in Island County.

8. The DEIS states, "There would be no significant impacts on water resources from construction activities or operation of new aircraft." (Page ES-9.) At page ES-10, under "Hazardous Waste and Materials" it is stated, "The existing practices and strategies would successfully manage the use and disposal of these materials." Similarly, page 4-285 asserts, "Hazardous waste management activities would follow existing procedures for the safe handling, use, and disposal of hazardous substances and waste." These assurances notwithstanding, it has recently come to light that a mile-long plume of 1,4-dioxane, a likely carcinogen, has been found in groundwater emanating from a dump site at Ault Field (*Whidbey News-Times*, January 21, 2017). The existence of this plume suggests that "existing practices" for handling of hazardous waste are insufficient.

   At page 3-62 the DEIS asserts, "Remediation construction was completed in September 1997, *human exposure and contaminated groundwater exposures are under control*, and the [operating units] at Ault Field and the Seaplane Base are ready for anticipated use." (Emphasis added.) In view of recent revelations of groundwater contamination, this statement is demonstrably false. The DEIS must be revised to include a discussion of this recently identified groundwater contamination and plans to ameliorate it, as well as a discussion of how procedures for the safe handling, use, and disposal of hazardous substances and waste are to be improved prior to the basing of additional Growler aircraft at NASWI.

9. In addition to the groundwater contamination discussed in comment 8, above, at least eight wells have been found to be contaminated with perfluorinated compounds from fire-fighting foam (*Whibey News-Times*, January 28, 2017). The Navy is now drilling test wells in an effort to map the extent of the contamination. In view of this ongoing testing, the full scope of well contamination around both Ault Field and OLF cannot be determined at this time. Thus, the treatment of this matter in the DEIS (e.g., page 4-285) must be updated with current information on the extent of well and aquifer contamination, planned steps for remediation, and plans to compensate affected water users.

10. Section 3.9.2.1, "Groundwater" must also be updated to include discussion of recently discovered groundwater contamination in the vicinity of both Ault Field and OLF.

11. Under the Navy's "A" and "B" scenarios, jet noise over Ebey's Landing National Historical Reserve would be substantial. The DEIS attempts to minimize this effect, stating at page 1-23, "In 2016, the National Park Service performed acoustical monitoring for the Ebey's Landing National Historic [sic] Reserve. . . . the report demonstrates that aircraft noise above 60 dB (normal conversation levels) occurred less than 1 percent of the time during the study period." Not only is this statement vague ("less than 1 percent" could be anything from zero to 0.999%), there is no information as to whether or not the time period in question was representative of OLF operations during 2016. Taking this statement on its face, under senario A of any of the proposed alternatives, noise levels above 60 dB could occur up to 5-6% of the time, or 7 hours/week in a average year[2]. The 7-hour figure is conservative insofar as "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." (DEIS at 1-5.) The disruptive effects of such noise on visitors to the Reserve should be given greater consideration in the final EIS.

12. Further to comment 11, details of the National Park Service's accoustical monitoring are provided in Natural Resource Report NPS/EBLA/NRR—2016/1299, *Ebey's Landing National Historical Reserve Acoustical Monitoring Report* (the "NPS report"). Noise was monitored at two locations as shown at pages 3-4 of the report. One of these locations, the Ferry House (EBLA002), is located well outside the 60 dB noise contour for the No Action Alternative as well as the proposed Action Alternatives (DEIS at, e.g., Figs. 3.2-5 and 4.2-5). The second site (Reuble Farmstead, EBLA001) appears to lie between the 65- and 70-dB contours for the No Action Alternative. "The highest recorded SPL and SEL at EBLA001 were 113 and 117.2 and at EBLA002 were 85 and 96.6, respectively; both of these were from aircraft." (NPS report at p. 14.) Levels measured at EBLA001 are hazardous to human hearing; exposure to 115 dB should not exceed 30 seconds continuous under NIOSH and CDC guidelines (e.g., OSHA Technical Manual, Section III, Ch. 5, II.I.2). The measured DNL during the monitoring period at EBLA001 was 73.6, substantially above the level predicted in the DEIS. These data should be afforded more weight in the final EIS.

13. In general, the DEIS is dismissive of actual, on-site noise measurements. Measurements discussed in comments 11 and 12, above, were made by equipment meeting ANSI standards (NPS report at p. 6), and data were analyzed by trained technicians (NPS report at p. 7). Data were collected for 31 days (p. 7). The NPS results raise questions about the accuracy of the models used to prepare the DEIS and should not be treated dismissively.

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[2] OLF flight data for 2016 are not provided in the DEIS. The calculation assumes approximately 6,000 FCLPs in 2016 as in 2014 and 2015, flights at OLF under Alternative 1A would increase to 35,100 (DEIS Table 2.3-2), and OLF operations are conducted weekdays only.

Additional on-site acoustic sampling was conducted by JGL Acoustics, Inc. in 2013. A report on this monitoring is available at citizensofebeysreserve.com/References/Files/JGL%20Noise%20Report.pdf and is cited in the DEIS at page C-124. A-weighted, 1-second Leq sound levels in excess of 115 dB were measured in residential areas near OLF. This report also shows measurement of 115.7 dBA at Position 3 (see page 2), the closest position to Coupeville Middle/High School. Given the allowed deviation from designated flight tracks (DEIS at page 3-7), Position 3 is a reasonable surrogate for establishing potential noise levels at the school. Measurements such as these should raise serious concerns about real noise impacts vs. modeled impacts.

The JGL Acoustics report is dismissed in a purely conclusory manner in the DEIS at page 1-23. Whatever "methodological flaws" exist in that report should be enumerated.

14. The DEIS is believed to rely too heavily on noise modeling in lieu of actual sound measurement. There is no indication in the DEIS that the models were ever tested against actual measurements made in the affected area. Given that reported measurements (comments 11 through 13, above) conflict with model-based predictions, the models should be tested and modified if necessary. Furthermore, the NOISEMAP software used for computer modeling appears to be an outdated version from 2008 or earlier (DEIS at A-21). A Department of Defense report prepared in 2010 states, "The acoustic environments in the vicinity of newer aircraft such as the . . . F/A-18E/F[3] differ from those of most prior aircraft, with high noise levels associated with higher thrust engines. At those high levels, *acoustic propagation cannot be modeled using the same simple linear theories employed in the classic noise models.*" (https://www.serdp-estcp.org/Program- Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304; emphasis added).

15. The DEIS relies on A-weighted sound measurements. "A-weighting puts emphasis on the 1,000 to 4,000 Hz range." (DEIS at p. A-142.) However, the Growler is known to produce substantial low-frequency sound. See, Department of the Navy, *Environmental Assessment for the Expeditionary Transition of EA-6B Prowler Squadrons to EA-18G Growler at Naval Air Station Whidbey Island, Oak Harbor, Washington*, Final, October 2012 (the "2012 EA") at pages 38-39 of the included Wyle report WR 10-22. As stated therein, "NASWI has received complaints of building rattle/vibration due to Growler events . . . With its increased low-frequency content, the Growler takeoff events have higher potential to cause noise-induced vibration." Frequency profiles, shown on page 39, indicate substantial sound levels at frequencies below 100 Hz. A-weighted sound levels are therefore an inaccurate measurement of Growler noise during FCLP operations and lead to underestimating perceived sound levels and effects on people and property. The final EIS should clearly convey the lack of correlation between A-

[3] The EA-18G Growler is the fourth major variant of the F/A-18 family of aircraft (*Selected Acquisition Report (SAR) EA-18G Growler Aircraft (EA-18G)*, March 17, 2016).

weighted measurements and the Growler sound spectrum or should adopt a different measurement standard. For example, Effective Perceived Noise Level, which takes into account tone components and duration, may be more appropriate than dBA. See, 14 CFR Appendix A to Part 36.

16. Values given in Fig. A-3 (DEIS at page A-154) for quiet urban nighttime (ca. 40 dB) and quiet urban daytime (ca. 50 dB) do not agree with those in Fig. 3.2-1 (30 dB and 40 dB, respectively). This discrepancy should be corrected or explained.

17. Figures A-3 and 3.2-1 should be amended to include day and night noise levels for rural areas. Much of the affected area around OLF is rural. Rural nighttime sound levels have been reported to be 25 dB vs. 40 dB in urban areas (Pennsylvania State University, noisequest.psu.edu/noisebasics-basics.html). Assuming a 10 dBA daytime adjustment (Noise Solutions, noisesolutions.com/resources/glossary/), daytime background noise in a rural area would be 35 dB, or about 20 dB below that experienced in urban areas. Using the quiet urban sound levels from DEIS Fig. 3.2-1 as a baseline, daytime rural background noise levels would be expected to be significantly lower than 35 dB.

18. The Navy has previously stated, "The primary factor considered in determining the significance of potential noise impacts includes the extent or degree to which implementation of the Proposed Action would affect the *baseline sound environment.*" (*Final Environmental Impact Statement for Naval Weapons Systems Training Facility Boardman*, 2015 at p. 3.4-15; emphasis added). The importance of recognizing low background noise levels in rural areas is also set forth in *Department of Defense Instruction Number 4165.57* (2011, 2015) ("DoD 4165.57"). The low background noise in affected rural areas should be taken into consideration in the final EIS.

19. Tables throughout the DEIS express data for sound intensity, aircraft operations, and other variables as averages, without reporting ranges (e.g., standard deviation or standard error). See, for example, page 3-12 ("As part of the noise analysis, flight operations were modeled for an "average year" at Ault Field and OLF Coupeville.") An average is, by definition, a product of multiple measurements none of which is precise in itself. While individual values will, it is hoped, cluster about the average value, the average alone does not provide a true picture of the data. Of particular concern is the averaging of noise levels, which may vary due to a variety of atmospheric and operational conditions. Average noise levels may therefore underrepresent the actual noise to which a person will be exposed for significant periods of time. Examination of Navy records available online at cnic.navy.mil show that operations at OLF in 2016 were clustered into periods of a few days to a week, with breaks of up to a month or more between some blocks of activity. While averaging of noise levels may be appropriate to civilian airports where daily activity remains fairly constant, it is not appropriate for characterizing noise from sources with a high degree of both short- and long-term variability.

The problem with a reliance on averages is also illustrated by the graph of flight operations on page 1-6. Over a 40-year period, total operations ranged from a low of approximately 63,000 in 2008 to a maximum of about 190,000 in 1990. An average of the annual numbers gives no indication of the actual range and the actual yearly impacts. The final EIS should provide ranges of values (e.g., standard deviation or standard error) in addition to averages in tables and graphs in keeping with standard practice for technical documents.

20. Under the Navy's own standards, existing development in the vicinity of OLF precludes the proposed action. The Navy has previously stated that APZ1 and APZ2 are "clearly incompatible" with housing and that Noise Zone 2, even in the absence of an APZ, is "normally imcompatible" with housing (*Draft Environmental Impact Statement (EIS) for Development of Facilities to Support the West Coast Basing of the F/A-18E/F Aircraft*, 1997 (the "1997 EIS") at Fig. 3-1). Similarly, *Naval Weapons Systems Training Facility Boardman Final Environmental Impact Statement*, Department of the Navy, December 2015 (the "2015 EIS") at Table 3.4-1 states that Noise Zone III (>75 dBA) is incompatible with residential/noise-sensitive land uses, and that Noise Zone II is normally incompatible with such uses. Table 3.4-1 particularly points to residences, mobile home parks, transient lodging, schools, hospitals, and churches as being incompatible with Noise Zone II (65-75 dBA).

Proposed Alternative 1A for NASWI puts the local Kingdom Hall of Jehova's Witnesses; Centerpoint Christian Church; Ryan's House, a temporary shelter for homeless youth; and the Admirals Cove, Crocket Lake Estates, Shangri-la Shores, Race Road/Lagoon, Harrington Road, Harrington Lagoon, Snakelum Point, and Kineth Point neighborhoods inside the 75 dB DNL noise contour (**i.e., in Noise Zone III**; see Fig 4.2-5). Coupeville Middle/High School, the Pennington Hill neighborhood, and the Olympic View Mobile Home Park are all within the 65 dB contour (Noise Zone II). **These *existing land uses are incompatible* with the proposed action according to the Navy's own standards.** Alternatives 2A (Fig. 4.2-12) and 3A (Fig. 4.2-19) are similarly problematic. Alternatives 1B (Fig. 4.2-6), 2B (Fig. 4.2-13), and 3B (Fig. 4.2-20) would also put most of these areas in the same incompatible noise zones. Even the C alternatives render at least most of the Admirals Cove neighborhood uninhabitable under published standards. DoD 4165.57 states at page 27, "Existing residential development is considered as pre-existing, incompatible land uses."

Under land use compatibility guidelines shown in DoD 4165.57, APZ-I is incompatible with residential housing, and APZ-II is compatible with detached, single units at a maximum density of 2 units/acre. The "Conceptual" APZ I shown in Fig. 4.3-1 encompasses much of Admirals Cove, as well as the Ryan's House shelter. The "Conceptual APZs" shown in Fig. 4.3-2 further encompass residential developments along Race Rd., Harrington Rd., and Harrington Lagoon that exceed the compatible density limits for APZ-II in the DoD Instruction. The final EIS must describe what steps will be taken to mitigate the effects of APZs.

21. The statement, "There are no schools located within the APZs at Ault Field and OLF Coupeville under any of the alternatives or scenarios; therefore, there is no disproportionate environmental health and safety risk to children as a result of possible aircraft mishaps" (p. ES-6) is disingenuous because only "Conceptual" APZs are shown and beacause certain proposed alternatives will require actual APZs under the Navy's criteria. The inclusion of detailed noise maps and flight activity predictions shows that the data needed to locate APZs are available at this time. The risk to children can be properly assessed only when the APZs are determined.

22. DoD 4165.57 states at page 11, "As a minimum, contours for DNL 65, 70, 75, 80, and 85 shall be plotted on maps for Air Force, Navy, and Marine Corps air installations as part of AICUZ studies." Maps in the main body of the DEIS do not include 80 and 85 dB contours, although the smaller-scale maps in Appendix A (which are difficult to read) include 80, 85, and 90 dB contours (e.g., Fig. 4-2 on p. A-39). These higher noise contours should be included within the main body of the final EIS so as to comply with the spirit, as well as the letter, of the regulations. The 80 dB corridor in Fig. 4-2 includes the Admirals Cove neighborhood and (perhaps) some residential areas north of OLF (again, the scale of the map prevents a clear reading). As discussed above, this level of noise is deemed, by the Navy, to be incompatible with a residential area.

23. When considering options for basing the F/A-18E/F, the Navy's evaluation of alternatives included analysis of effects on noise-sensitive areas where an increase of 1.5 or 3 dB would occur:

> "Noise-sensitive areas experiencing an increase in noise of DNL 1.5 dB or more into or within the DNL 65 dB noise exposure when compared to the No Action Alternative for the same timeframe (aerial maps of the areas were inspected for residences or other sensitive receptors within the 65 and 70 dB contours) were considered a significant change in the noise environment. . .
>
> "If noise-sensitive areas at or above DNL 65 dB showed an increase of DNL 1.5 dB or more, further analysis would be conducted to identify noise-sensitive areas between DNL 60 and 65 dB having an increase of DNL 3 dB or more due to the proposed action aerial maps of the areas that were inspected for residences or other sensitive receptors within the 60 and 65 dB contours." (1997 EIS at page 3.4-10.)

This sort of analysis does not appear to have been conducted for the present DEIS. The proposed Action Alternatives increase the size of the relevant noise zones. An explanation of this discrepancy in analytical approaches is required.

24. At page ES-3 of the DEIS it is stated that "[t]he Navy recognizes that noise impacts to the community are an unavoidable adverse effect of the Proposed Action." However, there are no alternatives proposed in this DEIS that would reduce noise. This omission is

contrary to the governing regulations, including 40 CFR 1502.1, which states that an EIS "shall inform decisionmakers and the public of the reasonable alternatives which would *avoid or minimize adverse impacts or enhance the quality of the human environment*" (emphasis added); and 40 CFR 1506.1, which states that, prior to the issuing of a record of decision, "no action concerning the proposal shall be taken which would: (1) have an adverse environmental impact; or (2) 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; emphasis added) See also, *A Citizens' Guide to the NEPA: Having Your Voice Heard*, Council on Environmental Quality, Executive Office of the President, 2007. By not giving due consideration to alternative sites for FCLP, the Navy has, in effect, improperly limited itself to a range of actions that will have adverse environmental effects. The Action Alternatives presented in the DEIS merely provide for different distributions of the same flights between the two runways. This approach pits the north and central Whidbey communities against each other, as the runway that receives more flights becomes the "loser" among these communities. The instant EIS process has already created rifts in the community, with two Island County Commissioners (both outspoken NASWI boosters) retaliating against the Town of Coupeville after members of the Town Council made comments on the DEIS in a public meeting (*Whidbey News-Times*, February 11, 2017).

25. The problems discussed in comment 24, above, have been exacerbated by the failure to identify a preferred alternative in the DEIS. Under 40 CFR 1502.14(e) an EIS must "[i]dentify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement . . ." The only preference stated in the DEIS is for 100% of FCLP operations to be conducted at OLF (page ES-3), but that scenario is not among the proposed alternatives. Since the Navy has not identified a preferred alternative, **the DEIS is fatally defective under the applicable regulations**. Further, since the Navy has 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.

26. Whidbey Health (formerly Whidbey General Hospital) should be added to the Points of Interest (Section 3.2.4.2 and elsewhere). The hospital is located in Coupeville at the intersection of State Highway 20 and North Main Street, approximately 2.5 miles northwest of the runway at OLF. In view of the flight tracks shown in the DEIS at, for example, Fig. 3.1-4 and given the Navy's admission that "aircraft can be several miles left or right of the flight track" (DEIS at page 3-7), Growlers can be expected to fly directly over Whidbey Health at low elevation. Resultant noise levels at Whidbey Health and their effects on patients must be considered.

27. Coupeville Middle/High School should be added to the Points of Interest (Section 3.2.4.2 and elsewhere). The school is located in Coupeville at the intersection of South Main Street and Terry Road, less than 2.5 miles northwest of the runway at OLF. As such, Coupeville Middle/High School is the closest school to OLF. In view of the flight tracks shown in the DEIS and the Navy's admission that "aircraft can be several miles left or right of the flight track", Growlers can be expected to fly directly over Coupeville Middle/High School at low elevation during FCLP. Maps of flight tracks on pages 3-8 and 3-9 show arrival and interfacility tracks that appear to pass directly over the school.

    FCLPs at OLF are conducted at altitudes of 0 – 600 ft above ground level (p. 1-8). If a Growler deviates from the flight track and passes over Coupeville Middle/High School, the noise level could exceed 109 dBA (Table 3.1-2). Based on the "Typical FCLP Operation" shown in the brochure *Growler Aircraft Operations at NAS Whidbey Island and OLF Coupeville*, 2015, a jet deviating from the flight track could pass over the school at less than 500 feet above ground level. According to the DEIS, "One laboratory study (Ising et al. 1999) concluded that events with Lmax above 114 dB have the potential to cause hearing loss" (p. A-169).

28. Table 3.2-4 shows a maximum sound level at Coupeville Elementary School of 98 dB, corresponding to a Growler at 2,000 ft. (Table 3.1-2). Table 3.2-4 does not appear to account for allowed deviations of "several miles" from flight tracks (p. 3-7). See also note 1 to Table 3.2-4: "In addition, there is some variability in how close the aircraft operation itself is to the POI, as weather, other aircraft traffic, pilot proficiency, etc. can affect the position of an aircraft within the modeled flight track." Allowed deviations from the FCLP flight track could result in aircraft passing over the Elementary School at 1200 ft. or less above ground level. The effects of such deviations should be taken into account in calculating maximum sound levels. Such data should also be presented for Coupeville Middle/High School.

29. According to the National Institutes of Health, "In order to protect the most sensitive 8% of the population, NIOSH recommends that hearing protection be worn whenever noise levels exceed 85 dB(A) ***regardless of duration***." (https://blogs.cdc.gov/niosh-science-blog/2016/02/08/noise/; emphasis added). This document also shows that the maximum daily occupational noise dose is reached in 15 minutes at 100 dB(A), and that for every 3-dB increase in noise level, the allowable exposure time is reduced by half. Thus, max daily exposure to 109 dB(A) (i.e., Growler at 500 ft.) is less than 3 minutes. NIOSH continues, "Even without knowing your time-weighted average, if the readout shows a level of 85 dB(A) or higher, NIOSH recommends that you take precautions to protect your hearing by reducing the noise when possible, limiting your exposure time, and/or using appropriate hearing protection." Under these recommendations, Coupeville Elementary students, who may be exposed to 90 dB (e.g., Table 4.2-11), will need to wear hearing protection at recess.

30. Some schools will be interrupted by jet noise dozens of times per week (e.g., Table 4.2-3), yet no mitigation steps are described beyond the belief that windows will be closed or air conditioning will be used. This sanguine approach ignores the fact that learning and school activities may take place out-of-doors (e.g., recess, physical education classes, sports practice, school garden, etc.). If mitigation measures are introduced in the final EIS, such measures would be new information, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's declared intention not to allow a comment period on the Final EIS would violate the NEPA process.

31. Coupeville Middle/High School should also be added to the Points of Interest (Section 3.2.4.2 and elsewhere) as an indicator of nearby residential development (Table 3.2-7, note 4). Neighborhoods adjacent to Coupeville Middle/High School include the Olympic View Mobile Home Park, Terry Mobile Park, and the SE Bainbridge Ln. area. A Boys and Girls Club is slated to be built on S. Main Street south of the Middle/High School campus, and a daycare center (Ebey Academy) is located across Terry Rd. from the Middle/High School. In view of the flight tracks shown in the DEIS and the Navy's admission that "aircraft can be several miles left or right of the flight track", Growlers can be expected to fly directly over this area at low elevation. Data for Coupeville Middle/High School should be included in all tables of noise impacts on residential areas.

32. The assumptions underlying discussions of residential noise impacts are not clear. For example, in the consideration of sleep disturbance at p. 3-37, what level of residential noise attenuation is assumed and is it reasonable in view of local conditions? Are the data reasonable in view of residential construction near OLF, including historic homes? Noise reduction standards discussed at page 3-65 appear to have been adopted in 2016, in which case only a small percentage of structures would be in conformance by 2021. The EIS needs to provide sufficient detail so that noise levels in actual, existing structures can be estimated.

33. The conclusion on page 4-236 that "[t]he Proposed Action would have negligible to minor to moderate impacts on the local and regional . . . housing market" is vague and unsupported by evidence. "Negligible to minor to moderate impacts" appears to this commenter to encompass a wide range of impacts, from essentially nothing to those that would be felt throughout the community. The brief discussion of property values in the DEIS avoids any meaningful analysis and attempts to obfuscate the issue by empasizing variations between studies, despite the admission that "aircraft noise has a real effect on property values" (page 4-232). Despite this admission, the DEIS makes no attempt to show how the predicted declines in property values would translate into actual dollar losses.

    The analysis of the effect of noise on property values based on the commercial value of property near airports is not relevant to property surrounding OLF. Studies at

commercial airports (e.g., DEIS at p. A-178) are confounded by the effects of airports on commercial property values. OLF is not a commercial airport and does not support high-value commercial activity. The only commercial properties adjacent to OLF are a storage facility and a depleted gravel pit that is serving as a disposal area for debris from land grading and clearing.

34. The brief discussion of impacts on property values in the DEIS omits any meaningful analysis of actual impacts, despite the admission that "aircraft noise has a real effect on property values" (p. 4-232). By the Navy's own admission, studies have shown that property values can be expected to decrease by from 0.2% to 2.3% per dB increase. These studies, which were done around airports, probably underestimate the effect on values around the OLF due to the confounding effect of higher commercial property values around airports and the episodic nature of the FCLP operations, which create much higher noise levels than the DNL averaging algorithm would suggest.

Assuming, *arguendo*, that property values near OLF would decline by only 0.5% to 1.0% per dB of noise increase, loss of value in the area would still be substantial. Taking noise level predictions from Fig. 6-9, the following losses can be calculated for a home with a present value of $300,000:

Location; Alternative	**Increase in DNL**	**Decrease in Value 0.5%/dB**	**Decrease in Value 1.0%/dB**
Admirals Dr. & Byrd Dr.; 1A	12 dB	$18,000	$36,000
Admirals Dr. & Byrd Dr.; 1B	9 dB	$13,500	$27,000
Race Lagoon; 1A	14 dB	$21,000	$42,000
Race Lagoon; 1B	13 dB	$19,500	$39,000

The effects shown in the table may underestimate actual losses from current value, because the data in Fig. 6-9 are presented relative to the No Action Alternative, not 2017 noise levels (and thus property values). These loss estimates are also conservative in being based on average-year data, rather than the higher, high-tempo year data (Fig. G.3-9).

Since the home is the largest asset for most home-owning families, these losses would be a tremendous financial burden on many residents. An examination of Fig. 6-9 shows that the greatest losses to homeowners would occur in the vicinity of OLF. The DEIS does not indicate how homeowners might be compensated for these losses. The final EIS should show projected aggregate

losses under the various proposed alternatives, as well as plans for mitigating such losses.

35. Under "Housing Impacts" (p. 4-231), the DEIS states, "[N]early all these additional households are expected to reside off base." The DEIS seriously underestimates the impact of this added housing demand, citing 2015 data for housing availability. Island County already has a shortage of low-income housing. According to Rick Chapman, owner of Coldwell Banker Tara Properties in Oak Harbor, "Rents on North Whidbey have gone up in the last two years probably 30 to 40 percent in some cases, 25 percent average overall" (*Whidbey Daily*, whidbeydailynews.com, April 21, 2016). Homelessness in Island County has increased about 34% from 2014 to fall of 2016 (*Whidbey News-Times*, Oct. 4, 2016). As reported therein, "Stagnant wages, a hot housing market and skyrocketing rents are putting more people out of their homes." The lack of affordable housing on Whidbey Island is also affecting seniors. Some low-income seniors have been on a waiting list for affordable housing for a year and a half (*Whidbey News-Times*, Dec. 28, 2016). There is no basis for the assumption in the DEIS that the number of "acceptable housing units" available in 2015 will be available in 2021 (EIS at 4-232); this statement is conclusory in nature and contradictory to reported housing trends. DEIS Section 4.11, Environmental Justice, does not address the present lack of low-income housing and rapidly rising property values in Island County discussed above. The "Environmental Justice Conclusion" at page 4-262 makes no mention of housing. These deficiencies must be corrected in the Final EIS.

36. "[T]he City of Oak Harbor and the Town of Coupeville are the defined affected environment for the assessment of impacts to emergency services such as police and fire protection." (DEIS at page 4-226.) Unincorporated areas of Island County, which are within the affected area, are served by fire protection districts and the Island County Sheriff, not by municipal departments. The final EIS should reflect this fact.

37. According to the DEIS at page A-59, an average year is 130,000 total operations, and a high-tempo year is about 135,000 operations. In contrast, historical numbers for flight operations presented on page 1-6 show total flight operations over a 40-year period ranging from a low of about 63,000 to a peak of 190,000. Although it is difficult to calculate an average from the graph, flight operations did not exceed 100,000 in half of the years and reached 170,000 or more in only three years. The data for FCLPs show a similar pattern. In view of the historical data, the assertion that a high-tempo year will exceed an average year by less than 4% is not believable.

38. Historical data presented at page 1-6 show that for the 40-year period 1976 through 2015 the majority of FCLPs were conducted at Ault Field. These data are summarized in the following table. Values were taken from the graph and are approximate in view of the small scale of the graph.

	Ault	OLF	Total
Average	25,325	13,675	39,000
Range	6,000 – 56,000	3,000 – 33,000	12,000 – 85,000
% Increase, max. vs. average	121%	141%	118%

Over the 40-year period, about 65% of FCLPs were conducted at Ault and 35% at OLF.

At page ES-4 of the DEIS, the Navy describes the proposed Action Alternatives:

> The increase in total annual airfield operations at the NAS Whidbey Island complex would range from approximately 40,100 (Alternative 3, Scenarios B and C) to 41,400 (Alternative 1). The increase in annual airfield operations at Ault Field would range from 12,300 (Alternative 1, Scenario A) to 38,700 (Alternative 1, Scenario C), while the increase in annual airfield operations at OLF Coupeville would range from 2,200 (Alternative 3, Scenario C) to 29,000 (Alternative 1, Scenario A). Airfield operations may include aircraft arrival and departure, interfacility flights, and closed-loop flights (such as FCLP). *These operational conditions would be similar to historic flight operations experienced in the 1970s, 1980s, and 1990s for the NAS Whidbey Island complex*, as indicated in Section 1.4. (Emphasis added.)

The characterization of these alternatives as "similar to historic flight operations" misrepresents the data. First, the numbers of operations are for an "average year" (see, e.g., DEIS at Table 6-2). The total *average year* FCLP operations at OLF would be as high as approximately 35,100 (combining the activity shown in Table 3.1-3 with the increases from p. ES-4). This figure is far in excess of the historical average of 13,675[4], and even exceeds the historical maximum by 2,100 operations. Some alternatives would reduce FCLP operations at Ault Field to well below the historical average. Second, Scenarios A and B alter the historical distribution of FCLPs between OLF (35%) and Ault Field (65%). Under Scenario A 80% of FCLP would be conducted at OLF, and under Scenario B 50% would be at OLF. It is actually the No Action Alternative that approximates the historical distribution of FCLPs.

It is requested that the EIS be revised so that proposed aircraft operations are characterized in an objective manner that is consistent with the data.

39. **IF** the proposed "operational conditions would be similar to historic flight operations" then one must wonder why the Navy now feels a need to shift the bulk of FCLPs to OLF. The historical record demonstrates that Ault Field can accommodate 2/3 of FCLPs even in a year with 190,000 total operations (page 1-6). High levels of FCLP (up to 56,000) were conducted at Ault Field ca. 1990. The DEIS does not show any operational

[4] Even for just the "1970s, 1980s, and 1990s" FCLPs at OLF ranged from a low of 7,000 to a peak of 33,000, with an average of 19,000.

problems or training deficiencies arising from this historical pattern. The DEIS has simply not made a case for moving these operations to OLF and creating significant adverse effects on the Town of Coupeville, nearby residential areas, and Ebey's Landing National Historical Reserve. NASWI has consistently received strong support from the Oak Harbor community, which would not be expected to object to continuing the historical Ault Field vs. OLF distribution of FCLP operations.

40. According to the DEIS at page 3-68, "Maintaining land use compatibility with the NAS Whidbey Island complex is of paramount importance to the City of Oak Harbor. . . The City of Oak Harbor has adopted the 1986 AICUZ noise contours to implement the Aviation Environs Overlay Zone through the city's zoning ordinance and other elements of the municipal code. Land within the Aviation Environs Overlay Zone is designated for low-density development. . . The City of Oak Harbor has also adopted a lighting and glare ordinance, helping to ensure the safety of aircraft operations by placing limitations on lighting that can impair a pilot's vision, especially at night." In contrast, it does not appear that the town of Coupeville has taken such steps (page 3-69). As discussed above in comment 20, there is substantial development around OLF, development deemed ***by the Navy*** to be incompatible with the proposed action. In view of these facts, the most feasible option among the action alternatives is one of the "C" scenarios, whereby most FCLP operations will be conducted at Ault Field.

41. Regarding Accident Potential Zones, the DEIS states:

> "Scenarios with high numbers of operations at OLF Coupeville may require the development of Accident Potential Zones (APZs) through the Air Installation Compatible Use Zone (AICUZ) update process . . . Conceptual APZs are presented for the purpose of analyzing potential land use impacts of the Proposed Action. *At this time, no decision has been made with regard to additional APZs.*" (Pages ES-5 – ES-6; emphasis added.)

The Navy's policy is to put APZs at runways in which there are 5,000 or more operations in one direction a year. Under the A Scenarios, that level would be exceeded for OLF runway 14 if 30% of FCLPs used that runway as is contemplated (e.g., page 4-17), and would certainly be exceeded for Runway 32 under any A or B Scenario. The statement at page 4-116, "APZs *could be warranted* at OLF Coupeville (see Table 4.3-1) under some operational scenarios" (emphasis added) is not correct. Under the majority of the Action Alternatives, **APZs would be warranted**, and the data needed to designate them are already in hand (e.g., flight tracks and noise contours presented throughout the EIS). At the very least, APZs are "reasonably foreseeable actions" and should be presented and analyzed as cumulative impacts.

42. The establishment of new APZs can be expected to reduce property values. APZs may also prevent development of property since they are deemed by the Navy to be "clearly incompatible" with housing. Will the Navy compensate property owners or will the

burden of such compensation fall on local government? As of October 2011 the City of Virginia Beach and the State of Virginia had spent or committed to spend $85 million on APZ mitigation, including property acquisition, incentives, and expenses. In addition, willing sellers had offered for acquisition more than $19 million of other property. See, *Virginia LIS Report Document No.* 337, 2011. A later report (Vergakis, Brock, *The Virginian-Pilot*, April 18, 2016) indicates the cost to the city has risen to $129 million. Island County's entire budget for FY 2017 is $85.7 million, and the State of Washington is struggling with a court order to fully fund basic education, raising serious doubts that local or state government could cover the cost of mitigation.

In other publications the Navy has attempted to minimize the effects of the proposed action by pointing to F/A-18 operations at NAS Oceana where "the population density in the area is far greater than that of either Oak Harbor or Coupeville" ("Pacific Northwest Growler Training Essential for 21st Century Battles," *Currents*, Fall 2015, 54-65). What is missing from this discussion is the resultant financial costs to local government (above) and the Federal government (a $34.4 million dollar settlement in 2007). The final EIS must address costs associated with noise and accident potential mitigation.

43. Most (81.6%) of NASWI personnel reside in Oak Harbor or the NASWI complex, compared to 3.7% residing in Coupeville (Table 3.10-2). The bulk of the economic impact of these residents (p. 3-151) can be assumed to accrue to Oak Harbor (e.g., ten times as many new households in Oak Harbor as in Coupeville; see p. D-3). Support for NASWI is strong in Oak Harbor, while opposition to FCLP operations at OLF is closer to the norm in the Coupeville area (see, e.g., *Whidbey News-Times*, Feb. 11, 2017, cited above). In view of these facts (and the decline in property values discussed above), the "C" scenario is the most just from a social and economic standpoint.

Table 4.2-1 shows much greater effects on the Coupeville population compared to Oak Harbor for sound levels of 70 dB and above (esp. >75 dB) for any Alternative 1 scenario. Table 4.2-3 also shows disproportionate affects on Coupeville area points (e.g., Admirals Dr. & Byrd Dr., Coupeville Elementary School) under alternatives 1A & 1B. Further disproportionate effects of the A Scenarios on the Coupeville area are shown in Table 4.2-25. Again, the "C" scenario is the most just from a social and economic standpoint.

44. The C scenario is also preferred when considering hearing loss. According to the DEIS at page A-17, "In terms of an Average NIPTS of at least 5 dB (item #4 above), the affected population would increase by a factor of 2 under the B-series of scenarios up to a factor 5 [sic] under the A-series of scenarios." For alternatives 1A, 2A, and 3A the burden falls disproportionately on the Coupeville area (e.g., Table 6-8a).

45. The C scenarios minimize other environmental effects.
(a) The greatest impact on land use is under Scenarios A & B (p. 4-159).
(b) For each alternative, Scenario A produces the greatest increase in air pollution. See, Table 4.4-16 on p. 4-145. See also, Table 4.4-17 on p. 4-146, p. ES-6, p. 4-286.

(c) The C scenarios minimize fuel use, as well as the noise and public safety effects of interfacility flights.

46. The OLF runway does not meet the Navy's own standards for the proposed actions. According to the 1997 EIS, a primary runway must be at least 9,000 feet long, and "[t]he minimum length acceptable for secondary runways is 6,500 ft" (page ES-4 and Section 2.2.3). When basing of all aircraft at NAF El Centro was under consideration in 1997, it was stated that such action "would require constructing a parallel runway at least 9,000 feet long . . . so that FCLP and and routine operations could be conducted concurrently. *Both runways would have to be 9,000 feet long*" (page 2-21; emphasis added). Not only is OLF, at 5,400 feet, well below the requisite length, but Ault Field also fails to meet these standards as it comprises intersecting runways each 8,000 feet long. The deficiencies of OLF, the shortest FCLP runway in the Navy, are also discussed in DEIS Appendix H ("An EA-18G requires a Class B [8,000 ft.] runway"). The rationalization for use of OLF appears to be that it is close enough to Ault Field to divert there in an emergency, but diversion to a facility that was considered substandard 20 years ago hardly seems to be an adequate solution.

47. Throughout the DEIS, a lack of consensus in published studies is interpreted as evidence of no deleterious effects. The DEIS resolves all ambiguities and uncertainties in favor of the Navy with no justification for doing so. This unbalanced approach is unwarranted and unsupportable, especially with regard to possible long-term effects on children. Examples of this problem can be found in the DEIS at page 1-19 ("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."), page 3-20 (where physiological effects on children are essentially dismissed as needing further study), Section 4.3, and Appendix A. Comments made regarding effects on children, such as at pages 4-120 and 4-121, are particularly troubling. Increasing aircraft noise over schools to levels known to be deleterious (e.g., comment 29, above) and justifying this action by claiming a lack of consensus is tantamount to conducting scientific research on school children.

This treatment of possible effects on children is inconsistent with the Navy's own admission at Page A-176:

> "While there are many factors that can contribute to learning deficits in school-aged children, *there is increasing awareness that chronic exposure to high aircraft noise levels may impair learning*. This awareness has led WHO and a North Atlantic Treaty Organization (NATO) working group to conclude that *daycare centers and schools should not be located near major sources of noise*, such as highways, airports, and industrial sites." (Page A-176; emphasis added).

Effects of noise on children must be given greater consideration in the final EIS.

48. Table 5.1 of the DEIS is deficient as follows:
(a) The statement, "The Navy is proposing the installation of security blocks on the perimeter of OLF Coupeville" is believed to be incorrect. Such blocks are already in place. The same statement is made at page 5-8.
(b) Characterization of transition to the EA-18G Growler as "to be completed in 2015" needs to be updated. It is either complete at this time or will be completed sometime in the future.
(c) Table 5.1 says nothing about basing of additional Growlers. *Selected Acquisition Report, EA-18G Growler Aircraft (EA-18G)*, March 17, 2016 ("the SAR") states that a total of 160 Growler aircraft are budgeted. This number is believed to constitute 42 aircraft in addition to those discussed in the DEIS. Although the SAR discloses an intent to sell some portion of these aircraft to the Australian Air Force, operating and support costs detailed in the report (p. 37) are explicitly directed to sustaining 160 aircraft. If the Navy is contemplating basing any of all of these additional Growlers at NAS Whidbey or operating them at NASWI for training purposes, such basing plans would be considered a reasonably foreseeable future action and must be addressed in Chapter 5 of the EIS.

49. The use of the terms "operations" and "FCLP" within the DEIS is confusing. An "operation" is defined in the notes to Table 6-2 as a single departure or arrival, thus "[c]losed pattern circuits consist of two operations." A similar definition is provided at page 3-11 ("A flight operation refers to a single takeoff or landing associated with a departure or arrival of an aircraft."). Table 6-2 shows that under Alternative 1A there would be 35,076 **operations** at OLF. In Table 6-3, the term "FCLP" is used to denote a "Type of Flight Operation," so one **FCLP** would be equal to **one departure *or* one arrival**. However, on page 1-6 the lower graph displays "Total Airfield Operations" as a line and "FCLPs" as a series of bars. It is not clear if an "FCLP" in this graph represents one operation or two. The term "operation" appears to be used elsewhere in the document to mean something else, such as in Table 3.1-1, wherein the term appears to be used to denote aircraft in flight. At page 3-7, "operations" is used more generically in the context of aircraft operating in flight tracks, seemingly equating the term "operations" with "continuous approach, landing, and take-off events." Further confusion arises from the use of these terms at page ES-4 ("Airfield operations may include aircraft arrival and departure, interfacility flights, and closed-loop flights (such as FCLP)."). The latter use implies that a single FCLP loop would be considered only one operation. It is requested that the terms "operation" and "FCLP" be clearly defined and used in a consistent manner.

50. At page 5-15, Section 5.4.3.4 the DEIS states, "This net increase in operations corresponds to *a net increase in a risk to public health and safety*, and BASH incidents" (emphasis added). The same paragraph continues, "[I]mplementation of the Proposed Action would not result in significant cumulative impacts to public health and safety." These statements are contradictory. Explanation or revision is required.

51. The DEIS does not give sufficient weight to the reduction of greenhouse gas (GHG) emissions. At page 5-33 the DEIS states:

> "The potential effects of climate change and GHG emissions are, by nature, global and cumulative impacts. *While individual sources of GHG emissions are not large enough to have an appreciable effect on climate change, the global accumulation of GHG emissions is resulting in global and local impacts on the climate.* The cumulative totals of GHG emissions as described in Section 5.4.4 would not likely contribute to global warming to any discernible extent." (Emphasis added.)

This statement is a classic example of "trying to have it both ways." Under this reasoning, no individual, local action would ever be significant, so there is no reason to reduce emissions, despite that fact that "[g]lobal climate change threatens ecosystems, water resources, coastal regions, crop and livestock production, and human health" (DEIS at p. 5-33). The final EIS must give serious consideration to the reduction of GHG emissions.

52. The recent and future expansion of operations at NASWI has been dealt with in a piecemeal process. Such an approach allows the evaluation of relatively small environmental effects while avoiding an analysis of overall impact (or allowing public review of the overall impact). It also leads to justifying later pieces by looking to sunk costs from earlier pieces of the overall expansion. This approach, which avoids analyzing cumulative effects, is contrary to the NEPA (40 CFR 1508.25). To date, aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula have been broken out into at least six separate actions:

1. Basing of 42 P-8A Poseidon Multi-Mission Aircraft at NASWI. This action is particularly relevant to the DEIS because it is one reason given by the Navy for shifting FCLPs from Ault Field to OLF (DEIS at pp. 1-7 to 1-8)
2. 2005 EA (57 Growler jets) and 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 (35 or 36 additional Growlers);

In addition, (a) 42 additional Growlers are in the pipeline, and some of those may be based or operated at NASWI; and (b) an AICUZ study to establish APZs will, in all likelihood, be necessitated by actions described in the current DEIS

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, a Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material.

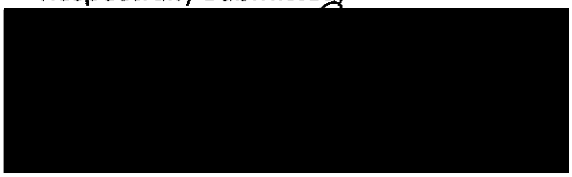
The number of Growler flights at OLF is projected to increase from approximately 3,000 per year in the mid-2000s to a proposed 35,100 in 2021. Despite this nearly 12-fold increase at OLF alone, Vice Admiral Mike Shoemaker has asserted that there would be "little impact on the surrounding community." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers (and, perhaps additional aircraft from the 160 on order), but slices out 35-36 of them for an incremental analysis, and concludes 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 is contrary to the intent of the NEPA and avoids accountability.

53. The current comment period on the DEIS should not be the last chance for public input. A Federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, 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." (40 CFR 1502.9.)

Deficiencies in the DEIS include an analysis of seismic risk with no basis in fact, the lack of a preferred alternative, the exclusion of significant points of interest, outdated information on aquifer contamination, the use of a questionable noise model that has not been verified against (and is contradicted by) on-site noise measurements, a lack of information on possible weekend and/or 24-hour use of OLF and attendant environmental impacts, an incomplete consideration of effects on property values, the absence of actual APZs,and a lack of information on mitigation measures. Correction of any of these deficiencies would warrant a further public comment period under the regulations.

Respectfully Submitted,



cc: Senator Patty Murray
Senator Maria Cantwell
Representative Rick Larsen
Governor Jay Insley

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**

Already on your email list

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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 Heath 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:

We should not be impacted from increased / increases in training FOREIGN buyers of Growlers. They should train (and impact) their own areas.

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12. Add your own comments here:

I support all of the detailed comment above. More generally, as a Vietnam veteran, and a former employee of the Defense Department (OSD at the Pentagon), I firmly believe the our military budget is too high, i.e., we have too many Growler wings for our real defense needs.

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)
have lived here since 1982
Resident, business owner

3. **Address** [redacted], Coupeville, WA
Business [redacted], Coupeville, WA
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)

- ☑ **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~~ 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:

- Why position all growlers on Whidbey = Logistically, they should be distributed a central location, + it places an unbearable burden on Whidbey + the surrounding areas.
- The increased noise with the planes + the proposed increase in flights will make it unbearable for those of us living + working in the noise zone.
- The economic impact of downzoning the impacted areas for land owners, business owners + local governments will be significant — and unlawful.
- Who will pay for the relocation of facilities (Island Transit, the County dump, possibly the middle/high school) in the crash zone, much less the loss of value for property owners?
- The noise modeling does not reflect true impact of these jets. Use true measuring.
- Alternative placement of these jets has not been considered + must be. The EIS is not accurate or complete!

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For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

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

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

1. **Name** [redacted]

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

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.**
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- ☒ **Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.**
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- ☒ **Aquifer and well contamination.**

Additional Concerns:

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

Please include any additional comments and concerns here:

I am especially concerned about the huge increase in flights, & the resulting noise impact on schools and our only local hospital. Already we must suspend conversations when these planes fly over. Increasing these intrusions endangers our children, patients at the hospital, workers in our fields - all of us.
Please consider these impacts and alternative sites for Navy training flights.

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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Prepared by Coupeville Community Allies
January 18, 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 accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

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

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

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

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

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to 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,

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

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

1. **Name** [redacted]

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

   for 25 years!!!

3. **Address** [redacted]

4. **Email** [redacted]

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

Comments

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

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

- X ☒ **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.**
- X ☒ **A decrease in private property values due to noise.**

(over)

- [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.** workers can't work.
- [x] **Aquafer and well contamination.**

Additional Concerns:

- [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:

- Can't watch TV or talk on phone when flying
- Schools & Hospitals need peace & quiet for healing concentration
- Contaminants in H_2O & soil!
- People have come to my house to ask how loud the jet noise is at this time, how about whe the increase comes

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resident

3. **Address** [redacted] Coupeville

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Please include any additional comments and concerns here:

As a resident I am deeply concerned about my community and my property values. Tourism will be effected by the noise and sight of military aircraft. Tourists come here for the quiet, bucolic environment which is why people, including retired military personal, like to relocate here. Property values drop in noise and crash zones that is a given and has not been addressed in the EIS.

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Please include any additional comments and concerns here:

As a birder and nature lover I don't find the impacts on wildlife especially the birds of Crockett's Lake (an National Audubon Society designated Important Birding Area (IBA) It is quite disturbing to think about the deafening noise on the susceptible wildlife which requires keen hearing think Short Eared Owls especially for their survival.

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1. **Name** [redacted] Retired Physical Therapist
2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military) [redacted]
3. **Address** [redacted] Coupeville, WA 98239
4. **Email** [redacted]

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It is hard to isolate one issue that would be of greatest importance but I think children's health and learning is at the top of my list though I am a homeowner in Coupeville. The damage to hearing, the added stress caused by the flights and there impact on learning and development are not trivial. My direct experience from working at the museum as a docent and a guide at the Pacific Rim Institute is that a conversation cannot be maintained during the flights. This needs to be thoroughly investigated. (impacts on health).

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

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

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

1. **Name** [redacted]

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

   3rd Generation of Coupeville Family

3. **Address** [redacted], Coupeville

4. **Email** [redacted]

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

Comments

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- ☑ **Health effects from noise and low-frequency sound.**
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- ☑ **A decrease in private property values due to noise.**

(over)

☑ **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:

- 40+ years of advocacy to 'preserve & protect' Coupeville will be destroyed because of an uncaring military - blindly ending a 163 years old community - a treasure to those who live (or will have lived) here and our entire country. At the same time drones are reportedly able to assume the role of the Growler and will. The Navy will sacrifice us for a few years of unendurable flights - immoral.
- water another use of the flame retardent could make central Whidbey uninhabitable - aquafer - not piped in River water
- APZ apparent lethal implications on property use & value
- education & Health Care - serious, unaddressed, consequences

The DEIS is lacking and boldly anti-citizen

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Prepared by Coupeville Community Allies
January 18, 2017

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1. **Name** [redacted]

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

   non

3. **Address** [redacted]
   Bellevue, Wa. 98004

4. **Email** _____

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(over)

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- ☑ The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- ☑ The impact on marine and terrestrial wildlife.
- ☑ The major security risk for Whidbey Island by siting all Growlers here.
- ☑ Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

Coupeville is the 2nd oldest town in Washington + a very pictorial area + we treasure that - also the county seat. This is a huge state + you can chose another location for these touch + go practices that won't be imposed like Coupeville. It is also a popular retirement area. Planes on the desert wanted these planes, go there to do this you already spend greatly for fuel (back in the '40's they flew to Boardman, Ore. to practice) The final EIS must include other options

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation _____

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

5. E-mail [redacted]

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

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

Anything less than incorporation of all the above concerns is a sham, and demonstrably proves the Navy's intent to circumvent the law.

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1. **Name** [redacted]

2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military)
'Resident citizen' who moved to Coupeville 17 years ago because of its beauty and charm.

3. **Address** [redacted] Coupeville, WA 98239

4. **Email** [redacted]

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Comments
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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.** We're right in OLF FCLP path — noise unendurable when outside. Must close inside or wear uncomfortable ear protectors
- **Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.** Noise over these facilities is criminal. NAS claims they don't fly over hospital, but some WCH employees disagree.
- **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.** Very important to central & South WI even though NASWI & Oak Harbor don't care.
- **A decrease in private property values due to noise.** What else can we say, undeniable!

(over)

- **Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.** Deception Pass campers leave, getting money back when planes fly at night. Baseball (kids) at Rhododendron Park has to wait for planes
- **Noise impacts on commercial properties including agriculture.** A tree farm north of Oak Harbor won a lawsuit against NAS a few years ago — flights were low enough to damage their trees!
- **Aquafer and well contamination.** NAS WI knew about problem up in O.H. years ago, even had EPA involved. Why were we never warned (near OLF)?

Additional Concerns:

- **The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.** It's a shock (yet another) to learn Crash Zones are community's job, not NAS!
- **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.** I believe NAS never looked at or considered our comments from "scoping forums". They DON'T CARE!!
- **The impact on marine and terrestrial wildlife.** Scary + unpredictable consequences!
- **The major security risk for Whidbey Island by siting all Growlers here.** Too obvious to even comment on except consider W.I.'s isolation if bridge is damaged.
- **Mishaps and crash risks due to problems such as their onboard oxygen system.** Any crash risk is unacceptable unless they fly over water!!

Please include any additional comments and concerns here:

Whidbey Island has always been treasured for its idyllic beauty and apartness; as is Olympic Peninsula. Moving ALL NAS Growlers here for 'economy of scale' is unjustifiable. Ruins this place of refuge and invites an attack of sabotage. Also very vulnerable here - no land link to mainland, no local water supply.

It will also exacerbate the problems of high-cost housing and homelessness in O.H. and strain that school system — with no help ~~for~~ from Navy-employees' taxes!

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1. **Name** [redacted]
2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military)
   resident right near OLF
3. **Address** [redacted]
4. **Email** [redacted]

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(over)

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Please include any additional comments and concerns here:

We live in what will become the expanded APZ, right under the OLF flight path. The level of activity at OLF has been tolerable since moving here in 2000. The increase proposed, however, will significantly reduce quality of life because of ten times as many days of unhealth noise and associated risks and values to life and property. Please consider offloading extra training to other sites.

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Prepared by Coupeville Community Allies
January 18, 2017

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,

Coupeville, WA 98239
408 218 8801

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1. **Name** [redacted]

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

   Cit. Retired Military

3. **Address** [redacted]

4. **Email** [redacted]

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Please include any additional comments and concerns here:

As far as Im aware its the ra ra soldier boy who Lives the lie that some other group of people is out to get him, who in This illusion of security, makes Life Hell for thoes Just trying to Live. Stop making and participating in War "Yes you Just Need to be brave"

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1. **Name** Dr. [redacted]
2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military)
   Pleas Please Care
3. **Address** If you Care Do something
4. **Email** if you Cant Care I Pray

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Water is being contaminated Please use
That enormous budget to clean it up.

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1. **Name** [redacted]

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

   citizen

3. **Address** [redacted], Coupeville, 98239

4. **Email** [redacted]

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Please include any additional comments and concerns here:

The DEIS does not address the financial/economic impact on Coupeville of drastically reduced tourism and loss of agriculture. These are the 2 legs our town stands on. We do not experience much financial benefit.
The DEIS does not address the financial/economic impact of the APZ's on Coupeville and the whole County. The newly upgraded Transit center is very close to O.L.F. Will it have to be relocated? It serves all of Island County. Who will pay the millions of dollars for that? In the liklihood that it will be Island County residents, they have a right to know that.

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

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

1. **Name** [redacted]

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

   citizen

3. **Address** [redacted], Coupeville, WA 98239

4. **Email** [redacted]

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

Comments

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

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

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

(over)

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

Additional Concerns:

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

Please include any additional comments and concerns here:

This has been an agricultural community since settlers first arrived in the 1850's. I personally know farmers who have been struggling to work their fields under current levels of flights.
The only other source of income for the area is tourism. Increasing flights at any level would negatively impact both of our major industries.
The APZs contain a unique state park, home to our state flower, the wild Rhododendron. Also a historical National Reserve, preserving much of our pioneer heritage.
The DEIS needs to consider other alternatives, i.e. no increase of flight at OLF, consideration of other sites

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For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Prepared by Coupeville Community Allies
January 18, 2017

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The DEIS does not adequatly address how the APZ's will affect Coupeville, and Island cty as a whole. The bus transit station, with fuel tanks, is very close to OLF. What zone is it in? It cost about $ 24 M to recently build it. Will it have to be abandoned and another one built? And who pays for it?

The are numerous businesses, including a gun club, in that same area. If they all have to be closed down, they need to know that is going to happen. And who pays for that? Do people just lose their property and livelihood, or are they bought out? Again, who pays for it? The only source of income this rural county has is property taxes, so the citizens pay, and they don't have any idea that could happen.

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The dramatic devaluation of property in the flight path and the accidental potential zones will result in a dramatic decrease in property tax revenue for ~~the~~ Island County. Much of the property in these zones is very high value, expensive view property. The county will then have to raise property taxes on other areas of the county, which will put an unrealistic burden on a county largely populated by retired people, (The mean age in Coupeville is 62) low paid agricultural people, and low paid wage earners.

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January 18, 2017

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

Handwritten comments last page.

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

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

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

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

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

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what 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,

[redacted]

Port Townsend, WA 98368

Not opposed to a Navy base but Olympic Peninsula is not a training ground. Too many people and noise sensitive areas.

1. Have found it difficult to conduct face to face meetings outdoors in Forks, WA area when Growlers overhead. (2016) Cannot even hear person I'm talking with 3 feet in front of me.
2. Listened to them every day while backpacking in Olympic National Park, Mt Olympus area. (2014) wilderness area.
3. P-3 Orion spent all night flying overhead Port Townsend at about 1,500 AGL ~3 years ago. Made local newspaper. Not a good neighbor strategy.

8 February 2017

The DEIS does not consider the cumulative effect of all the negative consequences of the proposed expansion. The following itemized list should be taken in its entirety to represent my objections to the proposed expansion.

Water Contamination -
Expanded flight operations significantly increase the likelihood of future use of toxic flame-retardants and additional water contamination, a threat made more severe by the Navy's commitment to using up existing stockpiles of PFOA/PFOS materials. This possibility of further contamination to the aquifer, and indeed current water contamination, is not adequately addressed in the DEIS.

I am now having to drink contaminated water from Coupeville's town well.

Noise -
Noise during FCLP operations impacts schools, residents, and the local economy, reducing property values and driving away tourist activity. Computer modeling of noise impacts does not adequately reflect the real impact on affected communities. The DEIS ignores scientific and medical evidence of harm caused by excessive noise.

Several farms in my community are considering shutting down operations because their employees cannot safely work outside under increased noise frequency.

Environmental Impact -
The environmental impacts of increased operations are not addressed in the DEIS, from harm to wildlife and effects of increased CO2 in surrounding marine waters, among other impacts.

Alternative Siting -
The DEIS offers no analysis of many alternative sites in the region for FCLP operations. The Navy is not acknowledging the reality of population growth in the region surrounding NASWI.

Economic Impact -
The Navy is externalizing costs of its expansion, to be borne by the community through lost or depressed property values, negative impacts on tourism and the necessity to remediate contaminated water.
Increased flight operations will require establishment of an Accident Potential Zone (APZ), further exacerbating property-devaluation impacts.

I have directly impacted my neighbors in the building trades by postponing renovation work at my house because this area of Coupeville may be affected too severely by noise to be livable. My property is already served by a contaminated well, and I am looking at a likely loss of property value if I sell my house.

[redacted]
Coupeville WA

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SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS

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

1. **Name** [redacted]

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

3. **Address** [redacted] Greenbank, WA 98253

4. **Email** [redacted]

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Please include any additional comments and concerns here:

I totally understand and appreciate the need for the military and the operations around us but it is important to be partners on this island in a balanced responsible way that respects and preserves the island resources and the creatures that live on it. Isn't the military ultimately about protecting?

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The Honorable Rick Larsen
119 North Commercial St.
Suite 1350
Bellingham, WA 98255

Mr. Ted Brown
Commander, US Fleet Forces Command
1562 Mitscher Ave, Suite 250
Norfolk, VA 23551, 2487

EA-118 GEIS Project Manager
Naval Facilities Engineering Command (NAVFAC) Atlantic
Attention: Code EV21/SS
6506 Hampton Blvd.
Norfolk, VA 23508

Coupeville Mayor Molly Hughes
P.O. Box 725
Coupeville, WA 98239

Gentlepeople,

I wish to comment on the Navy Growler Field Carrier Landing Practice (FCLP) environmental issues. My wife and I have our primary residence of 16 years in Coupeville and we own other properties within the area of concern. We are firm supporters of the Navy presence on Whidbey. We believe, however, the issue of severe acoustics and now apparent water pollution in some areas threaten the health and finances of many residents, regardless of statistics detailed in the Navy Environmental Impact Studies. We have heard of people who moved from Coupeville and surrounding area on doctor orders to preserve their health. At times, we and some friends of ours retreat to our basements or don protective ear gear to lessen sound to tolerable levels so we can function or sleep. Also, who wants to purchase or build a residence that is subjected to such an environment? Clearly, there is a definite health and financial impact on the community at large, beyond just brief periods of annoyance.

Assuming the Growler is here to stay, it seems the only way to resolve the multitude of issues surrounding FCLP is to eliminate the need or decrease the need to an "acceptable" level. Relocating FCLP to another location or attenuating the sound pressure levels at the engine source does not appear practical.

The EA-18G Growler has digital flight controls which means it can be controlled by sensors and software. A system currently exists that allows near automated landing of carrier based Growler aircraft (Google "Navy's Magic Carpet Simplifies Carrier Landings"). The H-12 version has been tested extensively in 2016. The H-12 version with failure modes will be available early this year and should be operational by the end of 2017 according to this recent article. The Navy has already stated that this system significantly **reduces** flight deck crew, **pilot training requirements** and maintenance and operation budgets! Also, the world is on the cusp of unleashing thousands and eventually millions of self driving vehicles on the highways and city streets where reliability and safety are paramount. Space X can now land a spent first stage booster on an ocean platform. Using these existing technologies, **automatically and reliably** landing a Growler on a carrier deck **under any realistic condition, eventually without any input from the pilot, seems very feasible (and certainly desirable).**

I believe there is minimal need to subject man, machine or community to the stresses associated with FCLP. If the Navy could tell the concerned public that the present FCLP schedule is a temporary situation until the Magic Carpet becomes operational (with an estimated time frame), I believe the community at large would be placated and the fury would subside. I would certainly put Magic Carpet on the fast track (if it isn't already). It solves so many issues.

If it is deemed absolutely necessary to give pilots FCLP, in addition to the many hours of simulator training, can that be achieved with a less powerful plane thereby reducing noise and perhaps reducing the number of actual Growler FCLP events? Hopefully, with a system like Magic Carpet, FCLP can be greatly curtailed or eliminated entirely.

Respectfully submitted,

[redacted]

Coupville, WA 98239
January 27, 2017

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

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

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

1. **Name** [redacted]

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

CITIZEN

3. **Address** [redacted] LANGLEY WA 98260 — actual address
[redacted], FREELAND WA 98249 — PO Box address

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)

- ☐ **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:

SEE ATTACHED DOCUMENT

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Prepared by Coupeville Community Allies

[redacted] (Clinton)
[redacted]
LANGLEY WA 98260
[redacted] (Freeland WA 98249)

Comments on the Navy DEIS re: impacts on Whidbey Island and the Pacific Northwest

SECTIONS IN THIS DOCUMENT:

1. SUBJECTS ADDRESSED IN THE DEIS:
   A. Airspace and Airfield Operations
   B. Noise associated with Aircraft Operations
   C. Public Health and Safety
   D. Education Impact – local schools
   E. Air Quality
   F. Land Use
   G. Biological Resources
   H. Water Issues
   I. Socioeconomics
   J. Hazardous materials and wastes
   K. Environmental impact
   L. Impact on Wildlife and domestic animals
   M. Effects of increased waste production and toxic chemical usage in planned training operations

2. SUBJECTS NOT ADDRESSED IN THE DEIS:
   A. Impact of jet noise on patient care at Whidbey Health
   B. Dumping of Fuel
   C. Impact on Tourism
   D. Impact on National Park and National Forest lands
   E. Noncompliance with NEPA standards for content and length of DEIS
   F. Briefness of Response Time vs. Length of DEIS
   G. Rationale for having 100% of all Growler jets stationed at NAS
   H. Impact on historic structures
   I. Additional Alternatives
   J. Actual need for additional Growlers
   K. Use of public lands for training
   L. Larger scope of noise evaluation
   M. Bluff Instability vs. Low Frequency Vibrations
   N. Compensation
   O. Flights outside planned flight zones
   P. Confusion on actual number of jets planned

ISSUES ADDRESSED IN THE DEIS

1A: AIRSPACE AND AIRFIELD OPERATIONS

The Navy DEIS states that flight operations on Whidbey Island will increase from 6100 to 35,100, a 575% increase. There are already issues and problems with the current operations. An increase of any amount is problematic. Details and data explaining these problems appear throughout this document.

1B: NOISE ASSOCIATED WITH AIRCRAFT OPERATIONS

In the DEIS Executive Summary, page E-5 the following is written:

"These include additional events of indoor and outdoor speech interference, an increase in the number of events causing classroom/learning interference, an increase in the probability of awakening, and an increase in the population that may be vulnerable to a potential hearing loss of 5 dB or more. Therefore, the Proposed Action would have a significant impact on the noise environment as it relates to aircraft operations at Ault Field and OLF Coupeville."

The Navy DEIS states that between 1,658 and 1,803 residents potentially risk hearing loss, directly due to aircraft noise exposure. *Any* risk of hearing loss to residents is unacceptable, but the intensity of noise form training flights actually poses greater harm than stated in the DEIS. For instance, children suffer disproportional harm due to higher vulnerability. (Reference: EPA - *Noise and Its Effects on Children*)

Calculation of decibels:
The Navy uses a computer simulation to determine the average daily decibel level (which includes non-flight time), and then spreads that over the year. They don't measure the actual noise generated on training days. Their finding: 90 dBA. However, the National Park Service, in a federally funded study, measured actual dBA at the actual locations in question to be as high as 113 Dba, Sound Exposure Level (SEL) of 117.2 dBA (at the historic site known as Reuble Farm).

Instead of dividing the averaged number by the actual number of days training operations happen at OLF, that averaged number is divided by 365 days, so that the

decibel level described in the DEIS appears much lower than it actually is when training operations are being conducted.

The computer modeling program used by the Navy to calculate aircraft noise levels (NOISEMAP Version 7.2) has been in use for at least 12 years, and was found by the Department of Defense's Strategic Environmental Research and Development Program (SERDP) to be outdated and might not be able to "provide legally defensible aircraft noise assessments of current and future aircraft operations."

The company that makes NOISEMAP 7.2 stated that a new aircraft noise model, the Advanced Acoustic Model (AAM), "...produces more physical realism and detail than the traditional integrated model."

The Naval Research Advisory Committee acknowledges that variations in noise from tactical aircraft measurement standards are not addressed because this program was developed measuring *commercial* aircraft noise, and that there are no standards for acquiring near-field aircraft noise data.

Therefore, the Navy's methodology is outdated, inconsistent with current noise measuring technology, and does not allow the transparency needed to establish baselines for risks to public health. The DEIS should use currently available best-practice models and technique to achieve a realistic assessment of impact.

Federal Interagency Committee on Urban Noise (FICUN) standards are invoked to justify the additional operational noise of between 2200 to 29,000 flight operations. These average the noise over non-flight days to an average of 65 Db. But the FICUN standards are for *urban airports* with flights regularly spaced throughout the 24/7, rather than bursts of 115 dB during some days and parts of days, which if averaged over those actual times qualify as intolerable and unlawful even by Navy standards. The DEIS should call out either training days or specific events with impacts analyzed.

Furthermore FICUN is outdated, and by new standards anything over 50 dB average is damaging to public health.

The DEIS projects that from 8 to <u>26% additional</u> locations will experience higher than sound criterion used for the DEIS.

The DEIS uses no on-the-ground data collection method but states that many thousands more flight operations above the current number, as well as an expanded footprint of land these operations will require, cause no meaningful negative effects on the population.

In fact, the current number of flight operations is already intolerable to many Whidbey residents. An actual noise study by the National Park Service in 2015 measured the noise at two different points in Ebey's Reserve over a 30 day period. One representative 24-hour period cited in the study recorded 281 "military aircraft events" that exceeded 70 Dba, which is 10 dBA over the limit of speech interruption.

Because the DEIS relies on sound level *averages*, either for example in regard to the noise the aircraft themselves produce or the ambient background noise levels in the study area, it understates the amount of actual noise produced by each aircraft.

The Environmental Protection Agency (EPA) states 60 DB is the level of speech interruption for normal conversation (U.S. Environmental Protection Agency, 1974), meaning a human voice cannot be heard above the interrupting noise.

For comparison, the noise volume of a jackhammer at 2 meters distance is approx. 100 DB. In a Navy report from 2005 on establishing AICUZ areas for NAS-WI the EA-18G (growler) jet on departure produces 117 DB, and on approach 114 DB, at 1000 ft. distance.

The Growlers fly directly over occupied houses, a middle school, and within 1000 feet of the hospital in Coupeville. People in these locales are exposed to these sound pressure levels up to 60-80 times a day (and night) when they are doing Field Carrier Landing Practice (FCLP). At pattern altitude, they get 115 dBA or more if they live close to the end of the downwind leg.

<u>From the Ebey's Landing National Historical Reserve Acoustical Monitoring Report (EBLA):</u>

Two acoustic monitoring systems were set up, and recorded data for 28 days on NPS property in the Reserve. The systems were deployed near the Reuble Farmstead (EBLA001) and adjacent to Ebey's Landing at the Ferry House (EBLA002). These systems collected continuous audio and sound pressure level (SPL) data for 731

hours and 741 hours respectively. A total of 1,853 Growler overflight events were identified during the measurement period. A single deployment of a Growler may have resulted in multiple events depending on the flight path. Some results were:

- Impact on citizens and animals: 2243 additional residential acres will be significantly affected by excessive sound levels
- Impact on farms: 1183 additional agricultural acres, many of which raise livestock, will be significantly affected by sound levels

EBLA provided a table showing effects at discrete acoustic levels SPL (dBA) Relevance:

- 35: Blood pressure and heart rate increase in sleeping humans (Haralabidis et al., 2008)
- 1: Desired background sound level in classrooms (ANSI S12.60-2002)
- 45: World Health Organization's recommendation for maximum noise levels inside bedrooms (Berglund, Lindvall, and Schwela, 1999)
- 52: Speech interference for interpretive programs (U.S. Environmental Protection Agency, 1974)
- 60: Speech interruption for normal conversation (U.S. Environmental Protection Agency, 1974)

EBLA provided a table showing how much time sound levels were above acceptable levels at night at two locations. The most outstanding figures were:

% Time above sound level: 19:00-07:00 (night times)

Location: EBLA001* - 20-1250 Hz at 35dBA 36.87% of the time

12.5-20,000 at 35 dBA 57.32 % of the time

Location: EBLA002** - 20-1250 at 35dBA 62.11% of the time

12.5-20,000 at 35 dBA 77.52% of the time

*EBLA001= Reuble Farmstead 6/19/2015- 7/21/2015 Agricultural Field 19 m 48.1893 -122.6664

**EBLA002 = Ferry House 6/19/2015- 7/21/2015 Agricultural Field and Ruderal Shrubland)

The highest recorded SPL and SEL at EBLA001 were 113 and 117.2 and at EBLA002 were 85 and 96.6, respectively; both of these were from aircraft. Figures 10 and 11 show the LAmax recorded during an event, different from the SEL (sound exposure level) which is equivalent to the total sound energy of the event, which is calculated as opposed to recorded. SEL is better when considering the intrusiveness of a single noise event. Where noise consists of discrete events the LAmax of the event will be a good indicator of disturbance to activities and sleep (Berglund, Lindvall, and Schwela, 1999). Nearly 100% of aircraft events exceed the hourly existing median ambient (L50). Levels of 70 dBA LAmax were exceeded by 281 military aircraft events at EBLA001 and 125 military aircraft events at EBLA002.

At EBLA001, there is a peak occurrence of military overflights at 14:00 to 17:00 and 22:00 to1:00. The aircraft recorded during these hours were the loudest recorded for the entire monitoring period.

From EBLA report: "Recent studies suggest that sound events as low as 35 dBA can have adverse effects on blood pressure while sleeping (Haralabidis, 2008)... The second level addresses the World Health Organization's recommendations that noise levels inside bedrooms remain below 45 dBA (Berglund et al., 1999)"

The National Park Service and Navy met in March 2015 to discuss operations on Whidbey Island and potential impacts of Growler noise at the reserve. The NPS and Navy agreed that additional acoustic information, collected at the Reserve, would be beneficial for the NPS to adequately respond to the NEPA (National Environmental Policy Act) document being prepared by the Navy. In July 2015, NPS started the above acoustic data collection. These data should be considered as valid for usage in a true DEIS.

Natural and cultural sounds are integral to ecosystem function and are one of the many resources and values that National Park Service (NPS) managers are responsible for preserving and restoring. NPS evaluates federal actions that may impact the human and natural environment within our public lands. Air, water and wildlife are valuable resources that can quickly be substantially harmed by inappropriate sound levels and frequencies. Intrusive sounds are of concern to the management of the National Park system because they impede the ability to accomplish the NPS mission of resource protection and public enjoyment. Anthropogenic noise may also disrupt ecosystem processes by interfering with

predator prey relationships and the ability of wildlife to communicate, establish territory, reproduce, support and protect offspring (Siemers and Schaub, 2011; Schroeder et al., 2012; McClure et al., 2013).

Visitors to many NPS units come with expectations of seeing, hearing, and experiencing phenomena associated with a specific natural or cultural environment, yet in many cases these environments are being increasingly impacted by anthropogenic noise altering their experience (Lynch, Joyce, and Fristrup, 2011).

According to table 4.1-2 the greatest increase in an average year for flight operations at OLF would be 547 percent. The metric for measuring the impact of this is calculated in conversation interruptions per hour averaged over 15 hours. Three to five planes run a touch and go pattern for up to 45 minutes. Being outside under an accelerating aircraft generating 104 to 127 db of noise is more than a conversation interrupter. It hurts and you must cover your ears. Increasing these 45 minute barrages by 547 % will have a significant impact. People live in central Whidbey because of its quiet rural atmosphere. The DEIS does not address the damaged quality of life, what is termed aesthetics by NEPA.

Presently, The noise has already increased because there are now two squadrons flying at a time, so while there used to be refueling breaks, they can now fly continuously, and do so for up to 6 hours per day, often as late as 1:00 a.m.

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 Ft1 is equivalent to a leaf blower or rock concert, both 1 "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 2 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 day2 . 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. Figure 1 Sound Profile of EA-18G 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. 2 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 3 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: 3 "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. Figure 2 Discarded Sound Energy Using A-Weighting 3 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 4 Operational Training Peaks From the Draft EIS: " Per Navy guidelines, pilots must perform FCLP before initial carrier qualification (ship) lands or requalification landings. The first carrier landing needs to occur with 10 days of completion of FCLP." Growler Squadrons currently have five Growers 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 FLCP 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. Calculating Sound Averages That More Accurately Describe Environmental Impact 5 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. 4 Table 4-4* Sound Exposure Levels and Maximum Sound Levels for Representative Flight Conditions F/A-18C/D F/A-18E/F Condition 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 period5 . The calculation for daily average of multiple events spread over a day is given by6 LCdn = CSEL + { 10Log10 (ND + 10 NN) } - 49.4 Equation 1 Where: CSEL = C-weighted Sound Exposure Level for a single event ND = Number of events per 24-hour period occurring between 7:00 a.m. and 10:00 p.m. (daytime) NN = 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 Log10 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. 4 Air Installations Compatible Use Zones Report, Naval Air Station Lemoore, California, November 2010, Page 4-14 5 Ebey's Landing National Historical Reserve , Acoustical Monitoring Report ,Natural Resource Report NPS/ELBA/NRR—2016/1299, pg viii 6 Fort Bliss Mission and Master Plan, pg

18 Calculating Sound Averages That More Accurately Describe Environmental Impact 6 SEL (dBA) ND NN Total FCLP Loops Lcdn (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 7 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 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 and businesses 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.

Effects of Low Frequency Noise:

Although some low frequencies produces at high amplitude are felt more than heard by people, their effects are significant. Here is a responsibly researched report on the effects of low frequencies on the human ear and body:

Low-frequency noise: a biophysical phenomenon M. Oud (medical physicist / consultant)* * Mireille.Oud@gmail.com, http://nl.linkedin.com/in/mireilleoud, the Netherlands Abstract Complaints on low-frequency noise were till recently fairly unexplained, but audiological research shed light on the mechanisms that enable perception of frequencies below the threshold of average normal hearing. It was shown that exposure to low-frequency sound may alter the inner ear. This results in an increase of sensitivity to low-frequency sounds, and as a result, previously imperceptible sounds becomes audible to the exposed person. Interactions between inner-ear responses to low and higher frequencies furthermore account for perception of low-frequency sound, as well as the property of the hearing system to perceive so-called difference tones. Introduction A growing minority of people experiences an increased sensitivity for low-frequency sound. Not surprisingly, they complain about noise, even about loud noise in some cases. Their complaints about the presence of hum, buzz, and rumble are often not recognized as a nuisance, since the majority of people does not perceive the very low frequencies. Low-frequency noise (LFN) may have serious health effects like vertigo, disturbed sleep, stress, hypertension, and heart rhythm disorders [1]. The number of sufferers is growing, and this has two possible causes. The sources of lowfrequency sounds increased in volume and dimension over the past decades, and auditory sensitisation takes years to develop. Nowadays, the main source of low-frequency noise is the public infrastructure: wind turbines, gas transmission grid, industrial plants, road and railway traffic, sewerage, and so on. Their expansion is enormous as it keeps pace with our rapidly increasing welfare and industrialization. Recent inventions like district heating (citywide hot water pipeline grids for home warming and hot tap water) and underground waste transportation furthermore add on to the sources of LFN. In recent years, more insight has been gained into the biophysical explanation for sensitisation of the hearing system for low sound frequencies. This paper

discusses several of the proposed mechanisms for this biophysical phenomenon. Biophysics of low-frequency sound perceptibility Sound audible to the human ear is in the frequency range 20 -20.000 Hz, and the ends of this spectrum are barely audible. In audiology, the measured range is restricted to the frequencies relevant to speech 125 - 8000 Hz [2]. LFN may be loosely defined as having frequencies below this range. Sounds of all frequencies can also be transmitted via the skull, thus by-passing the eardrum. This is called bone conduction and it occurs most with low frequencies. Tones with low frequencies therefore contain no spatial information for our hearing system. (For this reason stereo equipment has only one subwoofer.) The maximum amount of sound pressure that is bearable is 140 dB (ref. 20μPa), the threshold of pain. As illustration: heavy traffic generates about 80 dB, and a normal conversation 60 dB [2]. At average sound pressure levels, frequencies within the range of speech are better perceived than very low or very high frequencies with the same sound-pressure level. This is what the widely used dBAweighting standard refers to. Figure 3 shows the low-frequency part of this standard. The cochlea is a bony structure, with three fluid-filled compartments that are separated by membranes. The basilar membrane is set into motion by sound-pressure waves in the upper compartment. This excites the outer hair cells of the sense organ on the basilar membrane, the organ of Corti. This organ lies in the middle compartment of the cochlea. The outer hair cells act as preamplifiers, and they excite the inner hair cells. The inner hairs cells transduce the mechanical activity Congres Geluid, Trillingen, Luchtkwaliteit en Gebied & Gebouw 2012 Low-frequency noise: a biophysical phenomenon 2/5 M. Oud (medical physicist / consultant) into electrical stimuli to the brain. In Figure 2 the sensitivity curves of the inner and the outer hair cells are shown, along with the noise spectrum of a Dutch wind turbine. It is seen that noise above 50 Hz can be heard by the average normal hearing person. Noise below 5 Hz is not audible for anyone. The region in between is not audible, unless the sensitivity of a persons outer hairs cells are altered. Frequency sensitivity of the cochlea is distributed over the basilar membrane from high frequencies at the basis (i.e. where the sound-pressure waves enter the upper compartment) to low frequencies at the apex (end point). At the apex, the cochlear upper compartment is connected with the lower compartment through a passage called the helicotrema. The pressure waves pass through the helicotrema into the lower compartment, in order to dispose of their remaining energy and extinguish. Frequencies lower than about 20 Hz cannot be heard by the average person, but they can be sensed as

vibrations, as most people will have experienced when standing near e.g. a subwoofer. A minority of people, however, are able to hear these frequencies as well. Low-frequency audiograms of three very sensitive persons are shown in Figure 1. These three subjects show to be able to hear sounds below about 20 Hz, sounds with pressure levels more than 20 dB less than the hearing threshold for normal-hearing persons. Several mechanisms in the cochlea may be responsible for this increased sensitivity and for other health effects. We will describe two hydromechanical mechanisms and two neural mechanisms. Figure 1: Hearing thresholds of three especially sensitive persons (from [5]). Figure 2: Unweighted noise spectrum of a Dutch wind turbine [7], hearing thresholds from Figure 1, and sensitivity curves of inner and outer hair cells [6]. The latter are based on animal hair-cell response characteristics, but with helicotrema and middle-ear characteristics for the human. Stimulation of the cochlea has been shown to result in swelling (hydrops) of the middlecompartment fluid (endolymph) [3]. The swelling results in flow of endolymph through a narrow duct that is connected with the sacculus. The sacculus is a compliant chamber with sensory cells that generate neural impulses to the brain when the head makes movements. When these cells are excited due to the endolymphatic flow, this is experienced as vertigo (dizziness) [4]. Endolymphatic hydrops is also known to contribute to occlusion of the helicotrema. When the helicotrema is blocked, the pressure waves bounce at the helicotrema and travel back through the upper compartment. They interfere with incoming waves and, with that, intensify the pressure waves in the upper compartment. The returning waves start at the apex and will loose their energy along their way to the basis. As they have most energy near the apex, they will excite the cochlear area near the Congres Geluid, Trillingen, Luchtkwaliteit en Gebied & Gebouw 2012 Low-frequency noise: a biophysical phenomenon 3/5 M. Oud (medical physicist / consultant) apex most: and this is the area with sensitivity for low frequencies. This may make the ear 20 to 30 dB more sensitive to low-frequency sounds [8]. The distance between the sensitivity curves of the inner and the outer hair cells is indeed about 20 dB; this supports the idea of LFN-induced sensitivity enhancement. As we saw from the dBA curve, higher frequencies are better perceived than low frequencies, at most sound pressure levels. However, at sound-pressure levels higher than about 85 dB SPL, the opposite was seen to occur: in measurements on the cochlear response of laboratory animals, the lowfrequency part of the cochlea then showed more response to 5 and 50 Hz tones than to a 500

Hz tone [9]. Another interesting finding in this laboratory experiment is the observation of biological amplitude modulation: sounds with higher frequencies could suppress the response of the cochlea to very low frequencies. With low frequencies at pressure levels that do not yield cochlear response (and thus no nuisance), a remarkable observation was made. A tone of e.g. 50 Hz could still exert its influence: it was able to suppress the response of the cochlea to higher frequencies [9]. When the spectrum of a noise source contains two coherent higher-frequency tones with only slightly different frequencies, their interference pattern show a beat with low frequency. Our hearing system perceives this form of amplitude modulation as a so-called difference tone. Normal-hearing persons can, under certain circumstances, hear this form of low-frequency sound too, e.g. when tuning a musical instrument. Musicians know these tones as 'Tartini tones'. Readers unfamiliar with this biophysical phenomenon are invited to listen to a sound example that we present online [10]. Figure 3: Equal-perception level curves used for weighting spectra, according to three standards. Figure 4: Wind turbine spectrum of Figure 2, with four different weightings. Discussion and recommendations Legislatory control of noise necessarily rests on noise-level standards for the average person, as these standards cover the majority of people. The ear of the average person is generally assumed to have a frequency-sensitivity characteristic according to the dBA-standard. When this standard is applied in the assessment of noise, as a weighting, the amount of low-frequency noise produced by public infrastructure seems small. The unweighted low-frequency level, however, can be considerable. For wind-turbine noise, this is shown in Figure 4. A growing number of people suffers from LFN-induced enhanced hearing sensitivity for low frequencies, with enhancements of 20 dB or more. The experiments discussed in this paper furthermore showed that low frequencies can generate more cochlear response than higher frequencies, when Congres Geluid, Trillingen, Luchtkwaliteit en Gebied & Gebouw 2012 Low-frequency noise: a biophysical phenomenon 4/5 M. Oud (medical physicist / consultant) their sound-pressure levels are considerable. At the time of construction of the dBA standard, highpowered low-frequency noise was not as common as today. It is likely that the phenomenon of reversal of sensitivity was not taken into account in the construction of the dBA curve. Therefore, for assessing low-frequency noise, other standards than dBA are required. The dBC-standard might be considered for this purpose, or the more recent dBG standard. The dBG weighting is an ISO-standard and is especially designed for assessing low-

frequency sounds [12], [13]. For a comparison, see Figure 4. The elder generation has been exposed longest to the noise of public infrastructure. It was found that the prevalence of LFN-complaints increases with age [1]. This supports the conclusion that long-lasting exposure to low-frequency noise, inaudible for years to the exposed persons, may at the long term result in alteration of the cochlea; such alterations could already be demonstrated in laboratory animals. When sensitisation finally occurs, the LFN "suddenly" becomes audible to the exposed person. This person will try and search for recent changes in his immediate surroundings that can be pointed to as "the" cause of his LFN problem. But not necessarily recent and nearby changes are the main and only cause. Ground-borne vibrations have a propagation length of tens of kilometres. In a small and densely built-on country as the Netherlands, the large propagation length inevitably causes the noise from the different numerous elements of the infrastructure to interfere and accumulate. So, looking for one unique structure as the source of nuisance may often be impossible and illogical. This explains why engineering attempts to localize "the" noise source are often fruitless. A single subset of infrastructure may in itself not produce sufficient low-frequency sound to cause problems, their combination may. In regulatory debates on combatting LFN, the discussion should therefore not focus on finding "the" industrial culprit (like "wind turbines"), but rather on the relative contribution of each industry. A special type of interference is the difference tone that appears when two sine waves are coherent and close in frequency. This tone is not present as an individual frequency in the sound spectrum. In order to detect the presence of low-frequency difference tones, measuring power spectra does not suffice. Coherence should be detected and therefore the time-evolution of phase spectra should be studied. This should be done at an appropriate frequency resolution. Sound spectra are often presented with logarithmically-spaced frequencies, because this is in accordance with the frequencydiscrimination characteristic of the ear. However, low-frequency beats arise from pairs of tones that are usually not distinguishable for the ear. To detect the presence of difference tones, spectral information with a high frequency resolution has to be gathered. The sufferer can indicate what beat period he hears, and this may serve as a guide to determine the in-situ required frequency resolution. If low frequencies are actually present in the spectrum, they do not necessarily have to be audible, or even be continually present, to be perceived. This paradoxical fact was shown in the experiments, and is a property of the cochlea. When a low-frequency sound does

not yield any cochlear response (and therefore no nuisance), it could still suppress the response to sounds with higher frequencies. In case the inaudible low-frequency sound shows up in intervals, the higher frequencies will seem modulated in amplitude. This may give rise to a perceptible beat with a period of the intervals mentioned. Low-frequency sound may cause endolymphatic hydrops, which may result in vertigo. We assume that physiological process as lymphatic flow and helicotrema blockage cannot resolve as quickly as sound can be turned off. Therefore, the dizziness may persist after the low-frequency sound vanished. As a consequence, LFN-measurement may yield zero result while the sufferer still has the physical complaint. Higher frequencies were found able to suppress cochlear response to low-frequency sounds. This form of masking may be an advantage for the LFN sufferer when there is a continuous presence of higher frequencies in the ambient noise. However, when high-frequency sounds show up in intervals, the amplitudes of the low-frequency sounds are modulated with the same period. Then, we Congres Geluid, Trillingen, Luchtkwaliteit en Gebied & Gebouw 2012 Low-frequency noise: a biophysical phenomenon 5/5 M. Oud (medical physicist / consultant) expect, another low-frequency beat will be perceived, with a period equal to the modulation interval. The above three effects are all due to cochlear properties, but they cannot be solely ascribed to cochlear problems: they still require the presence of low-frequency sound in order to manifest themselves. Data on the prevalence of LFN in the Netherlands do not exist. Systematic investigations have not yet taken place. The need to do so has become fairly apparent, but suitable measurement protocols still need to be developed. In addition, a dedicated nuisance-assessment methodology needs to be developed for LFN. This is because LFN-sufferers miss many of the coping strategies that sufferers from traditional noise have. First, they do not have any means of shielding against LFN. Since LFN propagation is mainly structure-borne, closing doors and windows is not effective. Earplugs are of no use, because LFN bypasses the eardrum. Secondly, LFN has no spatiality and is therefore perceived as being located "within the head". The sufferer literally cannot distance himself from the unwanted sound. Thirdly, LFN never lets up, since public infrastructure is continuously in operation. Fourthly, social control, like talking to the neighbours in case of music nuisance, is not applicable. Lastly, moving house will not bring a solution since the propagation depth of structure-borne low-frequency vibrations is large and the public infrastructure densely present in our small country. All this implies that LFN exceeds tolerable noise levels

and noise durations sooner than traditional noise does under comparable (but not yet established) noise loads. Acknowledgement The author kindy acknowledges Dirk van der Plas, Ellen Mulder and Lies Jonkman of the Dutch low-frequency noise vigilance group [14] for their constructive support. References [1] G. Leventhall, P. Pelmear and S. Benton, A review of published research on low frequency noise and its effects, Report for Dept. for environment, food and rural affairs, London (2003) [2] F.N. Martin, Introduction to audiology, Needham Heights: Allyn and Bacon, (1997) [3] Salt, A.N. Acute endolymphatic hydrops generated by exposure of the ear to nontraumatic low frequency tone, JARO 5, 203-214 (2004) [4] A.N. Salt and J.T. Lichtenhan, Perception-based protection from low-frequency sounds may not be enough", Proc. inter.noise, New York (19-22 Aug. 2012) [5] C.S. Pedersen, "Human hearing at low frequencies with focus on noise complaints", Ph.D. thesis, Aalborg University, Denmark (2008) [6] A.N. Salt and T.E. Hullar, Responses of the ear to low-frequency sounds, infrasound and wind turbines, Hear. Res. 268, 12-21 (2010) [7] G.P. van den Berg, The sound of high winds: the effect of atmospheric stability on wind turbine sound and microphone noise, Ph.D. thesis, Rijksuniversiteit Groningen (2006) [8] A.N. Salt, D.J. Brown, J.J. Hartsock, S.K. Plontke, Displacements of the organ of Corti by gel injections into the cochlear apex, Hear Res. 250, 63-75 (2009) [9] A.N. Salt and J.T. Lichtenhan, Responses of the inner ear to infrasound, Proc. 4th Int. meeting on wind turbine noise, Rome (12-14 April 2011) [10] http://tiny.cc/LFG2012NAG: .ppt presentation with graphs, pictures and sound examples associated with present paper (Dutch text) [11] A.N. Salt, Infrasound: yours ear "hear" it but they don't tell your brain, Proc. 1st int. symposium 'The global wind industry and adverse health effects', Picton, Canada (29-31 Oct. 2009) [12] R. Cedric R., Ecoaccess guideline for the assessment of low frequency noise, Proc. of Acoustics 2004, 619– 624, Gold Coast, Australia (3-5 Nov. 2004) [13] ISO norm dBG: http://www.iso.org/iso/catalogue_detail.htm?csnumber=13813 [14] Belangengroep Laagfrequentgeluid http://www.laagfrequentgeluid.nl

1C: PUBLIC HEALTH AND SAFETY

(See Also 1H: water issues)

The human body perceives jarring noise as a danger cue, which triggers a stress response—even during sleep, and even in people who have lived in noisy environments for years. When exposed to short, intermittent noises during sleep, study subjects experienced heightened heart rate, blood pressure, and stress hormones. Long-term exposure is even associated with long-term cardiovascular problems.

The DEIS refers to health effects on the average person: someone in their 30's or 40's with no particular physical and/or emotional vulnerabilities. The demographic groups most vulnerable to the Growler's noise are children/youth whose bodies are not yet fully developed and the aging, which by definition are not at their best, but nevertheless make up a significant proportion since we have a large retired population.

Accident Potential Zones for Navy airfields:
APZs are required to be assessed for any DoD fields with 5000 operations per year. In 2004 the Whidbey AICUZ determined that an APZ wasn't required at the OLF due to the level of operations the *previous* year. This conclusion of course proved inaccurate. In fact the OLF most likely has been out of compliance for many years, according to the Navy's own requirements.

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."

The DEIS provides no data on accident history or mishap rate of EA-18G or the F-18 Hornet platform. In actuality the All-Navy Class A Mishap Rate over the past ten years is 1.27 mishaps per 100,000 hours flown. At the rates in the DEIS, the translates to 3-4 "mishaps" over the next 10 years. (See the graphic for the NAS stats available in a 2003 DEIS.)

Additionally, ignoring pilot error as a potential cause for a mishap creates an unrealistic view of accident potential.

The above quote is the extent of effort expended on an accident risk analysis in the DEIS. Yet a thorough risk analysis must accompany every credible EIS. A manual from the Department of Energy on EIS preparation says an EIS must include treating a "maximum foreseeable" (different from worst-case) accident, its probability of happening, its potential adverse consequences and its remediation. The magnitude of a risk must be calculated from its probability and its consequences; comparisons of risks for each alternative should be done.*

Stating "reliable aircraft" and "well-documented safety record" is not appropriately backed up by data. The Navy withheld important statistics (i.e. 22 crashes since 2000 of the EA-18G and its closely related F/A-18 E, F aircraft) from the DEIS.

Several aggravating factors at OLF are conducive to accidents, thus endangering the populace, the environment, local properties and the airmen themselves. The EIS accident risk analysis for all four action alternatives must include factors such as facility shortfalls, unique Whidbey atmospheric challenges, scheduling compromises, contributors to pilot error such as night flying, and must include the most pernicious Growler technical problem: hypoxia effects.

Furthermore all EISs must include the potential harms and disruptions resulting from use of the dated OLF facility as well as outline the consequences of accidents of various levels of complexity and intensity. Omitting such an analysis fosters a tone of unrealistic optimism that prompts the proposal to multiply flight operations sixfold while pronouncing "no significant impact." There is no realism here: it is obvious that amplifying flight operations will severely escalate the likelihood of a significant life- and property-destroying "impact."

The following EIS-omitted factors are amplifiers of, and results of, accident risk:

Compromises on facilities:

- 35% shorter than regulation Growler runway-length
- 1/40 of the required open acreage surrounding the runway-length
- residences, fuel depot, businesses, county facilities, a highway and a city are within accident-risk areas near runways and often within short distances of their ends.

Atmospheric conditions:

- Frequent wind shifts, creating dangerous tail-winds for allowed T & G's, some witnessed so far as even exceeding strict wind-speed regulations
- Common presence of birds that endanger engines
- Frequent fog, rain events, and wind that can force "edgy" calls on permitted flights.
- A six-fold increase on demand for precious flight times (meaning half the days of the year are needed for flights); this is very likely to result in further tightening the line between "flight go" and "flight abort" calls, leading to decreasing the safety envelope.
- A vast "*density altitude*" difference between OLF (d.a. 337) and typical Middle East sortie locations (Persian Gulf d.a.2182). While not endangering pilots in training it endangers them in a war theater: increases their risk of hitting a Persian Gulf carrier deck too hard or not soon enough by misjudging the lift of the air.

Pilots and planes – circumstances contributing to risk:

- Night flights with tired pilots (tiredness welcomed for realistic practice)
- The troubling rise in the number of breathing and pressurization problems in FA-18G and Hornets; the pilots rate the Growler's tendency toward hypoxia their most pressing problem.
- Pilots are trainees learning new, dangerous maneuvers, automatically increasing accident risk above routine flights done by seasoned pilots.
- The Growlers are part of a family of similar planes that have a significant accident rate: 38 crashes (and numerous incidents of dropping pieces from flight) since 2000. (The F-18 series, of which the Growler is part, is rated at a minimum 5.6 times as likely to have *mishaps* than its predecessor, the Prowler.)

Potential effects of catastrophic accidents on the Whidbey Island Community

- Dispersal into the water table of fire-fighting Type B foam with health-endangering, banned, toxic ingredients. Training and accidents have already injected these into the Whidbey water table, rendering some vital citizen wells unusable, and endangering the Coupeville water supply (toxins detected at barely acceptable level). These banned toxins are still being stored on Whidbey for emergency use and increased flight ops will risk their use.

- Increased economic, health and infrastructure damage from several catastrophic accident scenarios, intensified by training in a moderately crowded civilian setting.

Conclusions and Implications of risky conditions at the OLF: the Navy finds itself adjusting flights, limiting schedules, and handling constant noise complaints, all because it is training on an inadequate facility in a highly populated region, yet it intends to expand operations. Meanwhile, a catastrophic accident could, besides creating real health, economic and environmental damage, shatter the public's diminishing patience and faith in local Navy ops.

With a realistic assessment of substantial crash risk, the time is right now to scope and begin a transition of anticipated increased Growler training to an alternate, more appropriate facility.

Further information and discussion of the accident-risk factors outlined above:

Compromises on facilities:

- The OLF runway is 5,200 feet long and regulations from which it has been exempted (by a permanent waiver issued by the Navy!) demands that it be 8000 feet. Additionally the antiquated runway depth is thinner than regulation, courting the possibility that it could crack because of six-times-intensified use and occur during a rough landing with the currently heavier Growler aircraft than what it was designed for. and create a high speed accident Furthermore, there is a highway (average 9000 vehicles a day) just a few hundred yards ahead of the field's north end. Takeoffs and landings at a few hundred feet above those drivers can be very startling and contribute to driver accident risk. But more important here, the highway proximity considerably elevates the disaster risk from a Growler accident where there is a failure to ascend after landing and the short runway is exceeded before the plane can stop. This is further amplified by the fact that often crowds of parked cars and gawkers accumulate to watch the FCLPs. Result: more civilian risks.
- During the most recent attempt to build an outlying field in eastern North Carolina, the Navy sought 30,000 acres of relatively undeveloped land as the current-day threshold to provide civilian safety and to prevent unreasonable encroachment. So the Navy admits that a contemporary outlying field

demands at least 30,000 acres of relatively undeveloped surroundings. At only 700 acres (!) OLFC falls 29,300 acres short of standard, (i.e., having just 1/40 or 2.3% the desired acreage). Another way to put it is that a 30,000 acre circle would be 3.8 miles in all directions from OLF's center and this circle would include the majority of the town of Coupeville, and numerous] residences, parks, and facilities east and west of OLF clear to the waters of the sound. The operations at OLF are a large foot stuffed into a small shoe, raising the risk of accident to considerable heights. Yet mysteriously the Navy is year-by-year, decade-by-decade granted permission to go full bore with increased operations, and even propose yet a six-fold increase of these operations, while declaring "no significant impact" in the DEIS, all while completely omitting an accident risk analysis. Exacerbating the problem is that the County, with the Navy's tacit indulgence has not discouraged development in accident-prone zones and has not designated accident protection zones (APZs) at the ends of the OLFC runway, creating "an accident waiting to happen" scenario. Aggravating this, the County has not respected in its zoning the Navy's stipulation of no residences (zero) within a [high] Noise Zone 2 area, (which is arguably also more accident-prone due to near-roof-top trajectories). We have now the reality of over 600 residential homes and businesses in elevated harm's way and, in 2016 it is useless to argue whose negligence, Navy or County) has passively allowed these to be placed there with no comment dating years ago. Furthermore, the low-level FCLP touch-and-goes mean that planes approach over neighborhoods at altitudes under 500 feet, in some areas as low as 200-300 feet. The FAA, however, requires no flights below 500 feet over homes or people, as codified by the Supreme Court. The conditions around OLF require the Navy to strongly bend (and break) legal regulations (and their safety margins) in order to function at all.

- Challenging, potentially dangerous atmospheric conditions: Pilots land and take off often with a tailwind (discouraged for actual carrier landings but a common problem at OLF). There are frequent wind events, fog, and major rain events (less frequent in most US war theaters but a fixture at OLF). Although the Navy theoretically restricts OLFCs s at OLF to tailwinds of less than 5 knots, Growlers have been observed on a number of occasions practicing with tailwinds of up to 10 knots and on one occasion, about 15-knot tailwinds, which is patently dangerous. Additionally these atmospherics cause endless scheduling headaches, present more danger for training

flights, and their inconvenience could cause a dangerous stretching of the acceptable window of safety for flights (as illustrated in the tailwind example above). All such risk-elevators must be evaluated in the EIS.

More on the tailwind problem: If a malfunction were to necessitate a full-stop landing, the ground roll would be significantly longer with a tailwind (1.5% per knot). Because the OLFC landing strip is only 5400 feet long, an aircraft needing to land could continue off the end of the runway. Directly ahead approximately a 1/4 of the runway length is Whidbey Island's Transit Fuel Depot, and then one more runway length further is the township of populated Coupeville. Loss of control in attempting to land could result in loss of aircraft crew and civilian residences. The other runway direction has the community of Admiral's Cove a runway length away as well. At a high approach speed of 160 to 180 knots (303 ft/sec), an out-of-control plane could reach the Fuel Depot (also many facilities and residences) in 17 seconds and, if flying low or with pilot ejection, the town of Coupeville in 34 seconds.

More on the Density Altitude problem: It is also worth mentioning that the Navy ignores the vast "*density altitude*" difference between OLF (d.a. 337) and typical Middle East sortie locations (Persian Gulf d.a.2182). Because aircraft behave according to density altitude rather than actual altitude, landing or taking off during high-density altitude conditions necessarily increases approach speed and involves longer landing roll and longer takeoff roll. This means fighters run the risk of hitting a Persian Gulf carrier deck too hard or missing it by flying too high with a pilot trained with the "feel," despite instrumentation, of the wrong air conditions. On May 29, 2016, a Growler landing aboard the carrier John C. Stennis in the South China Sea engaged the carrier arresting gear while still in flight. Result: millions in damage. (Yakima training area, for instance, a proposed OLF alternative with far greater area and, while 1400 feet above sea level, has a density altitude of 2963 (around that of the South China Sea). Could training there have prevented the costly Stennis accident?) The EIS needs to evaluate such factors in the interest of airmens' safety.

A note on the huge accident-risk reduction of an alternate field like Yakima: Risk considerations in a EIS must consider alternative actions that reduce

risk. As an alternative, the Yakima training field, for example, has near zero lethal civilian accident risk, infrastructure accident risk, civilian health risk from Growler nonise, and groundwater pollution risk (no aquifer running underneath it like at Coupeville). And a Yakima-like field's bonus: while higher than sea level, it supports the plane's weight much more typically of war theaters than the OLF, thus adding to the safety of airmen flying missions in the middle east. Previous vetting of alternatives has overlooked many of these risk-lowering benefits (assumed because risk was not even evaluated in the DEIS) and it appears that distance from Ault Field is one of Yakima's down-sides due to fuel limitations of the fighters. But aerial refueling is very common with the Growler missions—an everyday non-event. Yes, slightly more expensive to fly further for training but nowhere equivalent to the expense to health and safety born by Coupeville residents *and to the flying airmen*.

- Hypoxia problems raise the risk probability. According to the *Navy Times 5/8/16: "Nothing scares Hornet pilots more than losing oxygen — and it happens all the time."* This article details the hypoxia (low oxygen) problem in the Growlers, which pilots have identified as their *top concern*.

<u>"Naval Air Systems Command is scrambling to implement fixes, but the brass has underplayed the severity and frequency of the danger since it emerged in a February 2016 congressional hearing, according to interviews with pilots and official reports."</u>

"These show a troubling *rise* in the number of breathing and pressurization problems, and that Navy and Marine F/A-18 Hornet and EA-18G Growler aviators view the problematic On-Board Oxygen Generation System as the fleet's most pressing safety issue by far (10 times over). Despite these issues, aviation bosses have not grounded the fleet, a common response to aircraft safety issues."

It is not possible to ignore he hypoxia problem in an EIS. It is perhaps a background contributor to several of the 22 Growler and F/A-18 E/F accidents since 2000 but may have been left out of the accident descriptions in that it can simply contribute to pilot error: misjudgment, fatigue, and distraction.

- Accident statistics raise the risk estimate: The accident risk evaluation must include probability predictions related to the statistics of crashes. It is challenging to choose which metric best predicts the likelihood of Growler accidents. One way is to look at accidents for the Growler *and* its close "cousin" models the F/A-18 E/F series worldwide. A ratio with the number of flight ops done with those models would be illuminating. Crash records can be spotty on information but our a good estimate is 22 such crashes since 2002 of which 10 were midair collisions in training and 12 were a random mix of pilot error and mechanical failures, in air and during takeoffs and landings, often with ejections. Midair collisions are less likely in FCLP training but the other 12 crashes of these type could happen at or around OLF during FCLPs. Due to the crowded conditions of OLF they would be quite costly in lives, property and environmental damage. The percent risk as indicated by these accidents is definitely not near-zero as was implied in the DEIS. Yes, the OLF has not suffered one of these *yet,* but many circumstances present in the other accidents are even more pronounced at OLF due to many night flights, hypoxia problems, tight scheduling and challenging atmospheric conditions.

  Another approach would be to look at all accidents since 2000 of fighters of <u>all</u> models flying in non-paired-combat-simulation in order to simulate the accident probabilities of a fighter doing FCLPs. Another is to look at all accidents of fighters of all types flying FCLP training. This information should be researched by the EIS writers. Here is yet another way: The All-Navy Class A Mishap Rate over the past ten years is 1.27 mishaps per 100,000 hours flown. At the rates projected in the DEIS, this translates to 3-4 "mishaps" over the next 10 years, some of which could be crash disasters. Finally, this statistic needs to be factored in: already there have been 24,000 operations at OLF with one accident, which translates to about 1.5 mishaps per 35,000 flight operations per year. Applying a proportion of "mishaps" that are crash disasters thoughout the Navy could provide yet another estimate of probability of actual crashes. It is the Navy's obligation to choose the best estimation technique for crash disaster probabilities and present it in the EIS.

  Note: It is important to keep in mind that the probabilities, regardless of which of these ways they are estimated, are elevated by a) some of the unique atmospheric and scheduling challenges of OLF discussed above and

b) by the sixfold increase of operations presented as a preferred alternative. A sixfold increase in operations can easily create a higher-than-six-fold increase in crash potential due to the complicated interaction of factors like tight scheduling, support staff fatigue, more crowded airspace, cutting the safety window too closely for weather events, etc. discussed above. In other words, it is not "if there is a crash disaster at OLF" but "when," and the EIS, all about "impacts," must describe the damage to life and property, and the disruption that follows, for the worst reasonably probable accident.

OLF operations court potentially highly destructive fatal accidents in a variety of ways:

- a shorter than regulation runway, with less open acreage surrounding it than regulation
- The OLF airfield was built for World War II planes and does not meet Navy requirements for use with modern jets, even though they have a waiver (see below).
- On page 4-9 of the DEIS states that one of the two runways at OLF has an "unacceptably steep angle of bank" and can be used only 30 percent of the time due to weather conditions.
- nearby neighborhoods and population centers are at risk
- there is a fuel depot straight ahead of the runway
- night flights with tired pilots (tiredness encouraged for realistic practice as part of training)
- dangerous touch-and-go maneuvers that require stable atmospheric conditions that Whidbey Island is short on.
- the "density altitude" of Whidbey is far different from that of the areas where the planes are currently deployed, thus creating risk when in an actual battle zone
- use of a fighter known to be accident-prone
- Three "Accident Potential Zones" - areas where crashes may occur - extend up to 5,000 feet from ends of the Outlying Field plus a 3,000-foot wide track located 1500 feet on either side of fields used for carrier landing practice, threatening hundreds of households with potential crashes and significant loss of property values.

- Already there have been 24,000 operations at OLF with one accident, which translates to 50 mishaps per 100,000 hours.

The Navy has statistics on the EA-18G mishap rate and is remiss in not including that information, or any forecast of future mishaps, in the DEIS in the interest of honest disclosure. 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." This is a contradiction.

The Navy provided the following information subsequent to the 2003 DEIS 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

During the most recent attempt to build an outlying field in eastern North Carolina, the Navy sought 30,000 acres of relatively undeveloped land as the current-day threshold to provide civilian safety and to prevent unreasonable encroachment. By comparison OLFC falls 29,300 acres short. At only 700 acres of land and a 5,200-foot-long runway (about 3000 feet short of Growler landing standard) OLF can only be classified as substandard and inadequate, and, neither acreage nor runway length are expandable. In fact, the Navy created for itself a permanent waiver to continue to use the OLF runway.

Centering a 30,000-acre mylar over a map of the OLF area would show inclusion of three public schools, the historic town of Coupeville (approximately 2000 residents), historic farms and homes, Admirals Cove with over 600 single home properties, a National Historic Reserve, a state park, several local parks, the island's main north-south highway averaging over 8,000 vehicles per day (route 20). An inflight emergency would be catastrophic. Accident Potential Zones (APZs) have not been designated at either end of the runway. If APZs were designated, they would violate Navy standards, because the APZ-1 would include over 600 residential homes and businesses.

In 1987, a Navy planning document (Navy document 101) reviewed and reported the status of the OLF for future use. It notes the depth of the concrete and below-standard length of the OLF landing strip as insufficient for new jets and increased use. The new, heavier aircraft cannot land at OLF safely. If a jet requires an emergency landing, it would not be allowed to take off, and would need to be trucked back to NASWI in Oak Harbor. That 1987 report recommended

alternatives to OLF be investigated by the Navy because of the encroachment issue. Instead, the Navy issued itself a permanent waiver.

In addition, both flight paths (14 and 32) require low-level approaches over neighborhoods at altitudes under 500 feet, in some areas as low as 200-300 feet. The FAA, however, requires no flights below 500 feet over homes or people, as codified by the Supreme Court. The court has ruled that a property owner controls use of the airspace 500 feet above their property and may make any legitimate use of their property that they want, even if it interferes with aircraft overflying the land (https://en.wikipedia.org/wiki/Air_rights). This is an FAA a regulation the Navy claims to honor as explained by this Oak Ridge National Laboratory Report:

> The military services are committed to safety and to minimizing the collateral noise associated with low-level flight training. The U. S. Air Force, for example, has set numerous restrictions and tailored its training to reduce noise as much as possible. The DoD in general, in addition to following its own flying rules of low-level altitudes and airspeed, also follows those in Federal Aviation Regulation 91.79 which states that no plane may fly closer than "500 ft [152 m] from any person, vessel, vehicle, or structure." (USAF Fact Sheet 96-17) In addition, because of the greater potential for human annoyance during sleeping hours, low-level flying by military fixed-wing aircraft generally occurs during daylight hours; low-level flying near densely populated areas is prohibited.

On approach to and departure from an OLF bounce, Growlers cannot comply with this 500-foot rule, and must cross over hundreds of residence, a well-used children's athletic field, dog park, county park trail system, and crowded recycle center. It is an uncompensated taking.

Additionally, although the Navy claims it only conducts FCLPs at OLF in tailwinds of less than 5 knots, Growlers have been observed on a number of occasions practicing with southerly tailwinds of up to 10 knots and on one occasion, about 15-knot tailwinds, which is patently dangerous. If a malfunction were to necessitate a full-stop landing, the ground roll would be significantly longer with a

tailwind (1.5% per knot). Because the OLF landing strip is only 5400 feet long, an aircraft could continue off the end of the runway. This could result in loss of the aircraft and crew and civilian residences, as well as endanger traffic on the three adjacent roadways and crowds that park unsafely along those roads to watch the FCLPs.

Direct Downward Radiation from Weaponized Directed-Energy Emissions:

Nowhere do any Navy NEPA documents from the last 7 years discuss the risk of exposure to chronic downward-directed radiation from weaponized forms of directed energy to civilians, wildlife and habitat. (The only discussion was a brief mention in the 2014 EA, in reference to radio transmitters on the mobile emitter trucks and the stationary transmitter at Pacific Beach. The Navy referenced a paper by Focke et al, 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.)

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards are overlooked or believed irrelevant for civilians exposed to the same or greater levels of noise. This double standard must be addressed and corrected in the DEIS analysis of noise exposure/dose impacts.

1D: EDUCATION IMPACT

DEIS 6.3 p 6-13 Unavoidable Adverse Impacts: "This Environmental Impact Statement (DEIS) has determined that the alternatives considered may result in significant impacts with respect to noise and education from implementation of the action alternatives."

Since significant impacts are predicted, it is imperative to address them. Yet the DEIS offers no alternatives.

The DEIS does not thoroughly address the impact on children. No mention of Coupeville Middle School or the Coupeville High School which are close to the flight pattern. For Oak Harbor, figure 3.3.2 on p. 3-47. Exec Order 13045 (p 3-44) states that it is a high priority to identify and assess the environmental health risks

and safely risks that may disproportionately affect children. *This has not been done.*

Noise generated in any of the DEIS scenarios interrupts classroom instruction (pages 4-35, 4-120) and exposes children to noise levels known to cause health issues if exposure is prolonged.

The DEIS does not recommend any amelioration - i.e. restriction of fight operation during school hours, avoidance of schools during school sessions, funding for sound insulation or any other possible actions to reduce interruptions or noise exposure.

Children play outdoors, take lunch breaks, wait for buses and walk to/from school during school terms and are directly exposed to sound levels in excess of 90 dBA during flight operations. Studies (see reference) suggest that permanent hearing loss is likely for exposure of just a few minutes at these levels.
Reference: •Children's health and the environment: A review of evidence. Tamburlini G et al., eds. EEA-WHO, 2002 (www.eea.europa.eu/publications/environmental_issue_report_2002_29)

A typical training day around OLF Coupeville would have 10 different Growlers doing 10 touch-and-goes each; for a total of 100 loops around the airfield. This would be spread over both day and night training and would happen on 175 days of the year. Since training is needed when squadrons are scheduled to deploy, this intense activity would be 5 days/week for 3-4 weeks at a time, then pause for 3-4 weeks, then resume.

The DEIS shows exposure of nearly 3,500 children to more noise at health-damaging levels, and interruptions in some classrooms at rates of up to 8 times per hour. (Reference: DEIS, Vol. II, Pg. A-133)

1E: AIR QUALITY

No information is presented in the DEIS on jet emissions and their impact on air quality. As an environmental concern, this should be addressed.

1F: LAND USE

NASWI has and continues to utilize sites other than OLF, reportedly including Fallon AFB in Nevada, Hanford NAS in California, North Island NAS near San Diego, China Lake Naval Air Weapons Station near Los Angeles, and Moses Lake's Grant County International Airport (once Larson AFB) in central Washington State.
One or more of these options, as well as others not included here, are surely viable and would allow necessary FCLP training without continuing and exacerbating community discord and turmoil, which history has shown elsewhere to have led to base closures.

When asked why other locales are not used, Navy representatives have responded verbally that "it would put undue stress on Navy families for the trainees to be away for so long." This is not a valid response, since all the other locations already have housing for families or could easily construct it.

Additionally, The Navy has contracted with civilian airports and other government agencies for FCLP training elsewhere. For Example, NASA and the U.S. Navy have signed an agreement to conduct FCLPs at the Wallops Flight Facility on the Eastern Shore of Virginia. They have also signed an agreement to conduct FCLP training at Greensville Municipal Airport in Virginia. Grant County International Airport (GCI) at Moses Lake in Eastern Washington is one such alternative FCLP location for NASWI (assuming these locations do not have similar population density concerns to those at Whidbey, in which case there are still remote locations available).

The DOD owns thousands of square miles of desert land in both California and Nevada where a new FCLP training facility could be located. For example, the Nellis AFB range facility covers approximately 6000 square miles (3.8 million acres) of unpopulated desert area.

Another alternative: Growlers do not operate at OLF during low ceilings, low visibility, and high wind conditions, all of which would be encountered in actual cruise situations. Flight simulators, however, would allow training under such weather conditions. Simulators provide far more exacting carrier landing details than possible at OLF. That is, OLF cannot simulate aircraft carrier movement, severe weather conditions, and emergencies, but simulators can do all of those things at no risk to pilot, aircraft, or resident homes and life.

1G: BIOLOGICAL RESOURCES

No comment to date

1H: WATER ISSUES

The DEIS dismissed addressing past, present, and future problems associated with perfluoroalkyl substances (PFAS). Long-chain PFASs are persistent when introduced into the environment, bioaccumulate in animals, and are toxic to laboratory animals, the EPA reports.

The DEIS apparently did not consider these toxic chemicals associated with fire-retardant foam to be a relevant impact even though the EPA does (Health Advisory) and even though PFAS have been discovered in wells adjacent to OLFC. Firefighter trainings and possible crashes would likely instigate further foam use and contamination of wells.

The fire retardant foam used by the Navy contains perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA). Perfluorooctanoic Acid has been found in wells near NAS and OLF. PFOA has been linked to kidney and testicular cancers, birth defects, damage to the immune system, heart and thyroid disease, and complications during pregnancy. The EPA's Science Advisory Board labeled it a likely human carcinogen.

Although the Navy describes the amounts found in its firefighting foam as "trace", PFOA is hazardous in tiny doses because it accumulates in the body and takes years to excrete.

The Navy judges "no significant impacts" to ground water from all its operations at Ault and OLF. In fact there has been detected a potential underground flow of some of the worst PFCs from a well on the OLF; testing of neighboring wells potentially affecting 10,000 people is currently underway by the Navy. To date significant toxins have been detected in some Coupeville wells. The OLF is situated on the one and only aquifer available to the whole of central Whidbey including the town of Coupeville.

All results of the well testing, including private testing as verification, must be disclosed in the DEIS. But the timing of the current testing does not support the comment period the Navy has allowed for the DEIS. Well testing results will be available "at the end of January" according to the Navy, while the DEIS comment period closes on Jan 25.

Vastly increased operations that include the new Growlers will increase likelihood of this kind of pollution, which has been problematic near several other military bases in the nation and has been the subject of class-action lawsuits.

The DEIS indicates that this would not be a problem because the Navy immediately cleans up after applying the flame retardant. But the well at Ault Field was tested to reveal more than 50,000 parts per million.

The NEPA Process requires that amelioration or contingency plans be in place wherever possible. The DEIS does not offer any realistic amelioration or contingency plans for well toxicity. The only plan mentioned is to provide bottled water.

In December 2016, the first of possibly many families was informed by the Navy that PFOA was found in their drinking water at more than six times the EPA's Health Advisory Level. A neighbor's well was also found contaminated, and the family warned against using their water for drinking or cooking.

The Navy has indicated through verbal statements by its personnel that a new formulation of firefighting foam has been adopted which is less toxic. However, there is no indication that they had disposed of their present stockpile of foam containing the older formulation.

In June 2016, the Navy announced they would be testing sites across the country for chemicals called Perfluoroalkyl Substances or PFAS, which are hazardous

chemicals used in the Navy's firefighting foam. PFASs have been known to be highly toxic since 2007 by the Environmental Protection Agency.

Navy documents show there are 13 possible toxic sites between Naval Air Station Whidbey and Naval Base Kitsap.

In May, the U.S. Environmental Protection Agency issued lifetime health advisory levels on two "long-chain" PFASs, perfluorooctane sulfonate and perfluorooctanoic acid, at 70 parts per trillion, individually and combined. Both of these chemicals are ingredients in "aqueous film forming foams," or AFFFs, a synthetic firefighting foam, according to the National Institute of Standards and Technology.

Welding explained that the foam is the most effective way to put out the petroleum-based fires that occur in aircraft accidents. The foam was used at the fire training area at NAS Whidbey and possibly on runways.

1I: SOCIOECONOMIC IMPACTS

Costs of hearing loss

www.hear-it.org estimates the economic burden of severe to profound hearing loss is $300,000 over a victim's lifetime, or $43,000 if it occurs after retirement.

Costs to schools

The DEIS estimates income from taxes and additional economic activity from the presence of Navy famlies on the island, but makes no effort to quantify the costs of the new activities such as the proposed additional load on schools which are already overcrowded. For example: nationally, a K-12 student costs $8-$10K per year exclusive of capital costs. These costs are available by school district, yet, the DEIS authors made no effort to quantify these or other costs.

The US Government pays no local taxes, yet 25% of the school budget is from local sources (mostly property taxes). 50% of Oak Harbor students are from federal employee (military) families, so (25% x 50% =) 12.5% should be expected from federal impact funds. The 2016-2017 Oak Harbor budget expects only 7.3% from federal impact funds, or about a $3M annual shortfall.

Costs to Low Income Populations

In section 3.11 of the DEIS, the Navy has concluded that there are no significant impacts on low income communities and communities of color. But in fact, people who can afford to sell their homes and move out of the impacted area have a choice, whereas low income people do not have the same choice. This *is* a disproportionate impact.

The DEIS fails to forecast impact of jet noise on demographics. Growler noise has and will continue to drive out residents who can afford to relocate. Due to the falling housing costs in undesirable (i.e. high noise and toxic-well) areas, lower-income families will be forced to live in these unhealthy, undesirable areas. This represents a disproportionately negative impact on economically disadvantaged populations.

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.

Loss of Property Value

The principle subdivisions affected by Growler noise lost 6.64% of their property value between 2010 and 2015. In Island County as a whole, property values dropped about 3%. Therefore 3.64% of lost property value can be attributed to the Growlers—a taking of about $9 million. This number will go up as the Growler program intensifies, and word of the problem spreads.

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.

The DEIS made no effort to compute the reduction in property values and only quoted academic work relating to commercial airport noise impact on property values. Data on assessment, sales and home values is available and can be computed on properties within and outside the impacted areas. This is how the $9,000,000 was calculated.

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 is further harmed.

Additionally, all properties with wells that have tested as toxic cannot be sold, so those properties are now greatly diminished. This represents a devastating loss for many families and individuals.

Sales taxes

Island County receives nearly the lowest sales tax yield per capita in the state (and other military-dependent counties compete with it). If the tax yield from Navy families were the same as from average Washington state residents, the County would receive $3.5 million more in tax revenue.

Opportunity costs

A military job has much less economic impact than the civilian equivalent – below we refine the models to determine how many civilian jobs it would take to equal the economic impact of the current & planned military jobs:

"In my economic model, I performed the following exercise. I removed all military jobs (the model has them at 6,170 in 2014), and redistributed them in sectors of the Island County where there was significant leakage (nonlocal expenditures). I distributed the jobs proportional to the leakages. The result was that the Island actually grows 5,511 MORE jobs (because of the indirect effects), with $607 million in additional wages, $1.6 billion in more value added, and $151 million in new state and local taxes. "

1J: HAZARDOUS MATERIALS AND WASTES: see 1E: Air Quality and 1H Water Issues

1K: ENVIRONMENTAL IMPACT

Page 4-296 states Scenario A will increase the entire Whidbey Naval Station Co2 output by 57% which is .7% of all plane emissions in Washington state.

(See Air Quality Issues, above)

1L: IMPACT ON WILDLIFE AND DOMESTIC ANIMALS

Wildlife:

The DEIS contains an inventory of the plants and animals that live in the study area, but nowhere does it address the effects of increased exposure to loud sounds, low frequency vibration, or water toxicity on any of these organisms.

Birds and animals use the pitch and frequency of each animal's "voice" as a determinant of its place in its habitat – where to be at what times of day or night, and what other animals inhabit that space at that time. Very loud noise disrupts this communication, both intra-species and inter-species, thereby disrupting habitat occupation, reproduction, and behavior. Further, loud noise can affect animals – both marine and land – as profoundly as it does humans. Hearing and general health (related to stress and immune function) are vulnerable. The DEIS does not address this issue except to say that any animals not already impacted "have adapted". No proof is offered, nor any definition of "adaptation".

From the EBLA report: "Anthropogenic noise may also disrupt ecosystem processes by interfering with predator prey relationships and the ability of wildlife to communicate, establish territory, reproduce, support and protect offspring (Siemers and Schaub, 2011; Schroeder et al., 2012; McClure et al., 2013)... "Chronic noise exposure... may interfere with predator prey relationships and the ability of wildlife to communicate, forage, establish territory, and reproduce (Barber, 2010)."

Further, animals drinking from water sources polluted by PFOAS leaching from a crash site or from fire-fighting training sites are just as susceptible as humans to the effects of those toxins.

The DEIS confines it wildlife impact information to mid-air collisions (birds and bats), and no mention is made on terrestrial organisms. With respect to avian species, the area lies in a critical migratory and breeding area; there is no doubt that increased flight operations will impact both, particularly breeding activity. This will certainly be true for terrestrial species.

The impact of increased flights over Olympic National Park for electronic warfare training is not adequately addressed. This park has been measured to be one of the last quiet places on earth; the navy's added flights will change this and impact many species, some of them endangered, such as the marbled murrelet.

Nascent sound scientists were tasked with gathering field recordings of nature's auditory ensemble and using them to study the relationship between sound and functioning ecosystems. A groundbreaking 1993 news dispatch from Sweden detailed its effects on wild animals: when a military jet flew over a zoo, animals ate 23 of their own babies as a protective response. (Those affected included Siberian tigers, foxes, and lynxes.) Studies have since shown that animals carve out sonic "niches" to hear the information they need for mating, navigating, hunting, and not being hunted. "To interrupt that information flow, even for a few brief seconds, is dangerous," Hempton says. When exposed to sudden bursts of unfamiliar noise, they revert to survival instincts. In wild areas where noise persists, animals have been known to drop in numbers. According to a 2006 report from the U.S. Fish and Wildlife Service, the Northern spotted owl, an endangered species found in Hoh Rainforest, has been found to neglect feeding its young, or even to eject eggs and juveniles from the nest, when noises like passing trucks or electric tools are present.

Farm Animal and Domestic Pet Impact

No assessment is given in the DEIS on the impact of flight training on the nearby farm and domestic animal population. Citizens have reported significant anxiety issues with their animals. A study of the number of animals that have disappeared during times of high noise (flight trainings), animals that have injured themselves, and other occurrences such as decreases in milk production in dairy cows, sheep and goats should be included in the DEIS.

ISSUES NOT ADDRESSED IN THE DEIS

2A: IMPACT OF JET NOISE ON PATIENT CARE AT WHIDBEY HEALTH (HOSPITAL)

The DEIS does not address the impact of high noise events upon patient care at Whidbey Health. Flying directly over a hospital cannot help but affect patient stability and the ability of medical staff to communicate with patients and with each other. No statistics are cited regarding increase in heart attack, stroke, and accident patients seen in the emergency room during or as a result of high noise events. This must be thoroughly studied for the EIS to be valid.

2B: DUMPING OF FUEL

Dumping of fuel: There is no mention in the DEIS of the practice at NAS Whidbey of dumping jet fuel over both land and water. This practice is of significant concern and should be addressed in the EIS.

2C: IMPACT ON TOURISM

The tourism industry in Washington State employs 154,500 people, creates $5 billion in earnings (payroll), generates total direct visitor spending of $17.6 billion and generates $1.1 billion in state and local tax revenue, and touches the community in countless other ways. Hotels and meeting facilities, attractions, restaurants, cultural institutions, tour companies and transportation providers are among the local businesses greatly impacted by travel to Washington State. *Source: Preliminary 2012 Travel Impacts Report / Washington Tourism Alliance*

Nationwide, the U.S. travel industry directly employees 7.4 million people, generates payroll of $188 billion, travel expenditures of $758 billion and tax revenues of approximately $118 billion. The U.S. Travel Association ranks travel fifth among 20 major private industry sectors. Visitors to the U.S. spend more here than U.S. residents traveling abroad, creating a $32 billion trade surplus for the national economy. *Sources: U.S. Travel Association, Bureau of Economic Analysis, U.S. Department of Commerce: Office of Travel & Tourism Industry*

From EBLA Report: "People visit national parks to see, hear and experience myriad phenomena associated with specific natural and cultural environments. Yet, in many cases, those environments are being increasingly impacted by anthropogenic noise altering their experience (Lynch, Joyce, and Fristrup, 2011)"

2D: IMPACT ON NATIONAL PARK AND NATIONAL FOREST LANDS

The Navy Plans to Construct an Electronic Warfare Range Covering Olympic National Park, Olympic National Forest and Western Clallam & Jefferson Counties

: 1. Periodic unannounced closures of portions of Olympic National Forest for war games, testing and training. 2. Up to 118 Growler jets flying over Olympic Peninsula communities 260 days/year, 8-16 hours/day, day or night, in 5,000 "events"/year. The Navy has not defined "event". Growlers fly in groups of three. This could mean 15,000 flights/year. Currently there are 1250 flights/year. The Navy must define "event". 3. Growlers, the loudest Navy jet, can produce 150 db, enough to cause instantaneous hearing loss. Navy statistics say they produce 113 db at an altitude of 1000 feet, well above the 85 db threshold for permanent hearing loss. Growlers can fly at 1200 feet above ground level in some areas of the Olympic Peninsula. With three Growlers flying together, local noise levels will be worse. 4. Ground-based equipment using 15 locations in the Olympic National Forest will emit enough electromagnetic radiation to melt eye tissue after brief exposure in close proximity. Growler jet electronic weaponry is far more powerful. 5. A National Park Service report issued in July 2014 showed that in 2013, 3,085,340 visitors to Olympic National Park spent $245,894,100 in communities near the park. That spending supported 2,993 jobs in the local area. Visits to the Park increased 17.1% in 2014. Without a clean and quiet environment this economic success will be a thing of the past. Alarming effects of a warfare range: 1. A Navy supporting document says, "Friendly Electronic Attack could potentially deny essential services to a local population that, in turn, could result in loss of life and/or political ramifications." 2. Each jet burns 1304 gallons per hour and produces 12.5 metric tons of CO2 per hour. This is 23% more than the annual CO2 emissions of a Washington State citizen. 3. Aircraft aerial maneuvers and their resulting horrific noise on the western half of the Olympic Peninsula will have an overwhelming impact on people living in or visiting the area. 4. In both wildlife and humans, effects from loud noise include hearing loss,

increased stress hormones, cardiovascular disease, immune system compromise and behavioral/psychosocial impacts. 5. One billion birds fly up and down the Pacific Coast Flyway each year. The effects of loud noise and electromagnetic radiation on their ability to find resting places and to navigate has not been analyzed by the Navy or the Forest Service. Why you may not have heard about the Navy's plans: 1. No public notices were published in any media that directly serve the northern and western Olympic Peninsula. In the absence of public comment, the Navy issued a "Finding of No Significant Impact." 2. Neither DNR nor Olympic National Park was consulted in the early stages of the Navy's Environmental Assessment. The Navy has not applied for a permit to use DNR lands. 3. Destruction of neither the "wilderness soundscape" over Olympic National Park nor property values in areas subject to jet noise are discussed in any official documents. 4. The Navy's EA said the EWR would include electronic surveillance AND electronic attack, yet none of its environmental documents evaluate the impacts of either electronic surveillance OR electronic attack in the EWR. 5.

2E: NONCOMPLIANCE WITH NEPA STANDARDS FOR CONTENT AND LENGTH OF the DEIS

The Draft DEIS as published is not compliant to NEPA requirements:

In the DEIS, a cost-benefit analysis was not performed as required by 40 CFR 1502.23. Of the many significant impacts stated in the DEIS (e.g. Additional households are subjected to increased aircraft noise, school interruption due to aircraft noise, APZ establishment restricting property rights, additional overcrowding in Oak Harbor schools, an already-tight housing market that will be further stressed), none have had cost/benefit analysis performed. The DEIS lists total employee earnings, but has no discussion of the costs to the public (schools, sewage, roads, other infrastructure) as a reasonable cost/benefit analysis would normally have.

Page limits have been excessively exceeded over the "normal" limit of 300 pages(Sect. 1502.7) having the effect of obfuscating the issues the DEIS should address as reflected by comments received during the scoping period.

The NEPA Act states that the primary purpose of the statement is to allow for a "full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment."

In order to accomplish its goals of a full and fair discussion, the Act sets out several requirements. Among them:

> Sec. 1502.7 Page limits.
>
> The text of final environmental impact statements (e.g., paragraphs (d) through (g) of Sec. 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 referenced DEIS is five times longer than the act recommends.

Sec. 1502.14 Alternatives including the proposed action.
This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Sec. 1502.15) and the Environmental Consequences (Sec. 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. In this section agencies shall:

> (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.
> (c) Include reasonable alternatives not within the jurisdiction of the lead agency.
> (d) Include the alternative of no action.
> (e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.

(f) Include appropriate mitigation measures not already included in the proposed action or alternatives.

The 9 different possible actions listed as alternatives are essentially one alternative (accept 35-36 new Growlers). Other alternatives for deployment, non-deployment or training dismissed with no analysis. "No action" is considered only as a baseline. There is virtually no substantive difference in the environmental impact of the 9 scenarios described. The Navy has not made a good faith effort to explore other alternatives as NEPA requires in Sect. 1502.14 (a).

2F: BRIEFNESS OF RESPONSE TIME VS. LENGTH OF DEIS

Reviewing and responding to the draft DEIS within the 75-day comment period determined by the Navy puts an undue hardship on other agencies and the public to have a "full and fair discussion" as required by the Act. This is particularly true because of the excessive length of the DEIS as discussed in the section above.

Since Sec. 1502.7 (Page limits) of EPA regulations for an EIS states that the text of final environmental impact statements (e.g., paragraphs (d) through (g) of Sec. 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 DEIS is far too large for the normal resident to absorb and understand in such a short period. Additionally, the fact that the comment period happened over a holiday period further complicates this because many will not have had a chance to voice their concerns in this timeframe. Actions that greatly impact a community require an appropriate amount of time to learn, understand and respond. The timing of this is not acceptable; the public needs more time.

2G: RATIONALE FOR HAVING 100% OF GROWLER JETS STATIONED AT NAS

No clear rationale for adding 35-36 aircraft to NAS Whidbey. Having all electronic warfare equipment in one locale creates a maor taget for those seeking to destroy electronic warfare capability, thereby putting both the public and national security at risk.

Another problem in using the OLF for exclusive military-wide electronic warfare flight training is the weather: frequent wind, fog, and major rain events. Winds for about 8 months in the year are predominantly from the south (i.e., tailwinds),

which means either canceling scheduled FCLPs or making pilots land and takeoff with a tailwind, something never done on carriers. More severe rain and wind events occur in the winter months, which compacts FCLP training into even fewer acceptable days, thereby forcing more FCLP sessions into summer days, when residents are outside and have windows open. Night flights must take off later during the summer, which exacerbates problems with late-night (10 PM to 1 AM) training, including sleep loss and annoyance.

The Navy argues that OLF is essential for simulating actual carrier landing conditions. The Navy states that FCLP training should be at conducted at <200 feet above sea level to simulate actual carrier landing elevation. That argument conveniently ignores *"density altitude."* Aircraft performance is based on *density altitude*, not *true altitude* above sea level. Density altitude is pressure altitude corrected for nonstandard temperature—i.e., it is a combination of barometric pressure, temperature, and humidity. Higher temperatures, altitude, and increased moisture reduce the density of the air. So, in a sense, density altitude is the altitude at which the airplane "feels" it is flying. A reduction in air density reduces engine power, aerodynamic lift, and drag. The EA-18G flight manual cautions pilots to calculate density altitude before each takeoff. That is, because aircraft behave according to density altitude rather than actual altitude, landing or taking off during high-density altitude conditions necessarily increases approach speed and involves longer landing roll and longer takeoff roll.

Table 2 compares density altitude of four possible western U.S. sites where NASWI could conduct FCLP training and compares them to both OLF and actual real world carrier launch conditions in the troubled South China Sea and the Persian Gulf (the two most likely areas for carrier launches to occur). Compared to these other west coast Navy sites, the OLF offers the worst venue for "train as we fight" conditions.

Table 2.—Density altitude comparisons at four west coast FCLP training options versus actual carrier launch conditions in the Persian Gulf and South China Sea. These examples are based on an "average day" at each location [from www.USA.com].

Location	Elevation (feet)[1]	Air Temp. (°F)	Barometric Pressure[2]	Dew Point	Density Altitude
FCLP Training at OLF Coupeville					
OLFC	200	51	29.92	35	**337**
FCLP Training Sites, U.S. West Coast					
Lemoore NAS, CA	230	62	29.92	56	**678**
Moses Lake, WA	1189	50	29.92	45	**1010**
El Centro, CA	–40	75	29.92	40	**1284**
Yakima Training Area	1370	77	29.92	43	**2963**
Actual Carrier Launch Sites					
Persian Gulf	60	88	29.92	88	**2182**
Manilla[3]	60	88.2	29.92	79	**2367**
Ho Chi Minh City[3]	60	90.3	29.92	81	**2525**

[1] Airfield elevations were taken from FAA Airfield Diagrams, and actual carrier elevations are mean sea level plus 60 feet to the flight deck.

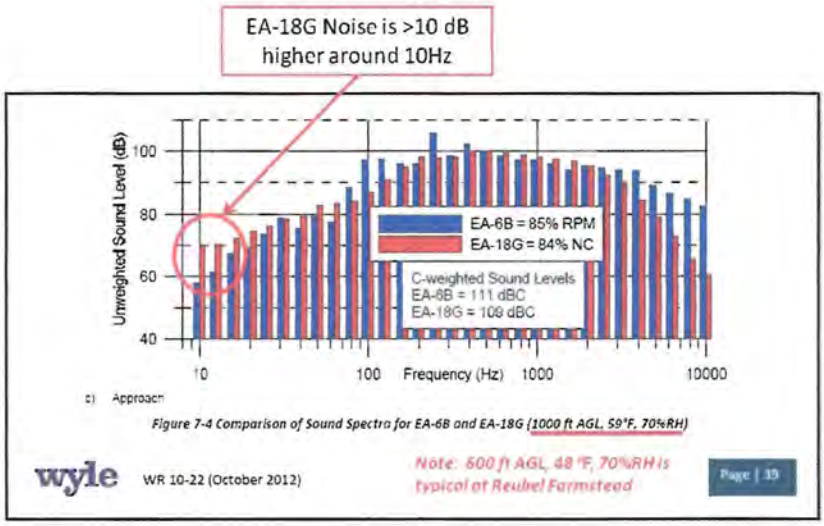
[2] FAA "standard day" barometric pressure is 29.92.

[3]Historical climatological data was not available for the South China Sea, as bounded by Manila and Ho Chi Minh City, but weather for these two cities should closely approximate.

2H: IMPACT ON HISTORIC STRUCTURES

Growler jets produce more low frequency noise (15-20dB more) than the A-6B they replaced, yet the impact of low frequency on historical structures isn't covered in the DEIS. Low frequency "rumble" below the range of human hearing can rattle buildings historical buildings are particularly vulnerable to weakening and structural failure. Low-flying Growlers generate damaging resonances which weaken structures, cause increased cracking and loosen joints, to make the structures more vulnerable to other deterioration causes (wind, rain).

The historic Reuble Farmstead at Ebey's Landing National Historical Reserve is directly under the FCLP flight path. EA-18G jets fly directly over Reuble Farmstead at 600 Feet for FCLP.



Source: Final VAQ EA October2012 Appendix C reduced.pdf

- Sound Exposure Level (SEL) over 100dB recorded by National Park Service for a single event monitored at Reuble Farmstead:

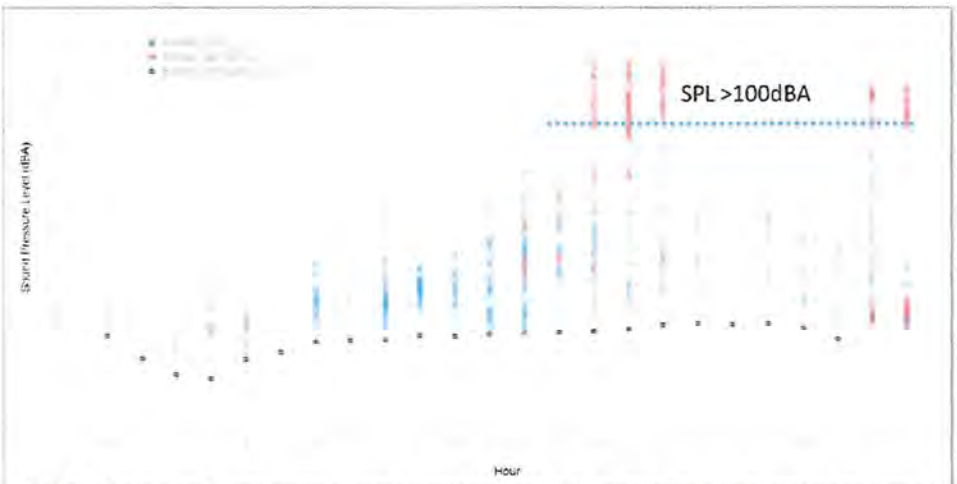


Figure 10. LAmax for all aircraft events recorded during the monitoring period at EBLA001, Reuble Farmstead, plotted hourly over the course of a 24-hour day

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

Increased low freq intensity of Growler may have an even greater impact on historic structure

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.

*Reference:
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 22,Table 2.3

We've measured 65 decibels and more, in back yards in Port Townsend, which is about 16 miles from Ault Field and 10 miles from the OLF airfield. Quilcene residents have measured 80 to 85 db. In addition to the serious health effects of which you are no doubt aware, sustained low-frequency noise from these jets has the power to compromise the structural integrity of buildings in historic districts, as the City of Port Townsend pointed out to you in a recent letter. This is not just a cultural concern; noise-weakened structures of any age are less safe in earthquakes and high wind events, and repairs will have to come out of municipal and Tribal budgets.

2I. ADDITIONAL ALTERNATIVES

The 9 different possible actions listed in the DEIS as alternatives are essentially one alternative (accept 35-36 new Growlers) with other alternatives for deployment, non-deployment or training dismissed with no analysis. "No action" is considered only as a baseline. There is virtually no substantive difference in the environmental impact of the 9 scenarios described. The Navy has not made a good faith effort to explore other alternatives as NEPA requires in S40 CFR 1502.14 (a), listed above. All of the Navy's 'alternative' scenarios will increase noise, harm health, and have other adverse impacts. The Navy's plan would increase Growler operations that already 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. Why is there no genuine no-action alternative?

" 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 originally 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 has not been addressed in the DEIS.

Training elsewhere:
The DEIS does not include consideration of acquiring property elsewhere to conduct safe flight operations with minimal impact to civilian populations.

40 CFR 1502.14, 'Alternatives Including the Proposed Action,' states:

> (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.
>
> (c) Include reasonable alternatives not within the jurisdiction of the lead agency.
>
> (d) Include the alternative of no action.

The "no action alternative" is given only for comparison purposes and is not presented as a true alternative. All the actual alternatives given involve additional Growlers and training activity on Whidbey Island.

2J: ACTUAL NEED FOR ADDTITIONAL GROWLERS

NEPA National Environmental Policy Act, 40 C.F.R. 1502.13 states that the "key aspect of a draft DEIS is the statement of purpose and need. "Section 1-3 of the DEIS states that the need for the proposal is to maintain and expand growler operational readiness. The original DEIS was for 13 aircraft. The Whidbey DEIS.com website states that since congress has approved 35 or 36 new aircraft it would not

be rational to consider only 13 aircrat. That rationality requires the assumption that any expiation of military readiness is in itself necessary. The DEIS has not demonstrated a need for 35 or 36 new arcraft.

2K: USE OF PUBLIC LANDS FOR TRAINING

The Navy does not adequately substantiate its need for non Defense Department lands, as was required by the 1988 Master Agreement; instead of proving that no DoD lands were available or suitable, it said using the Olympic Peninsula's public lands was for the purpose of saving $4 to $5 million dollars of jet fuel per year. Saving fuel is a good goal, but this reason does not prove that DoD lands were either unavailable or unsuitable, which was the primary requirement of the Master Agreement.

2L: LARGER SCOPE OF NOISE EVALUATION

The geographic scope of noise evaluation for this DEIS as described on page 5-12 of the DEIS is limited to the immediate environs of the Naval Air Station Whidbey Island complex, yet Growler noise is chronic and loud in many communities and wildlands in other areas that these flight operations impact; they may not hear takeoffs and landings, but they do hear and are severely affected by jet noise, including the use of afterburners for aerial dogfighting.

2M: BLUFF INSTABILITY VS. LOW FREQUENCY VIBRATION

No data is provided in the DEIS on bluff instability concerns and how low frequency vibration at high amplitude produced by Growler jets can cause instantaneous or eventual bluff erosion along the coast. Citizens have observed bluff collapse immediately following fly-overs. This must be addressed.

2N: COMPENSATION

Regarding the possible establishment of new noise exposure zones, the DEIS' "Air Installations Compatible Use Zone" (AICUZ) guidance recommends "lower land-use density" within these noise zones. It says, "land uses previously considered compatible may become incompatible." In other words, farming and residential land uses, which are what largely surrounds OLF and NAS, could become "incompatible," whether they desire this or not. How will the Navy compensate these people for loss of property values, loss of livelihoods, and loss of traditional recreational opportunities?

2O: FLIGHTS OUTSIDE PLANNED ZONES

Although The DEIS states that flights will sometimes veer from planned flight zones, and citizens outside flight zones experience this to be true on a regular basis, all of the information in the DEIS relates only to planned zone impacts. Citizens in Anacortes, for instance, report Growlers often flying directly over the town. Clearly there are impacts from flights not within planned zones. This should be addressed.

2P: CONFUSION OVER ACTUAL NUMBER OF JETS PLANNED

The DEIS figures are for 35 or 36 more growlers to be added. However, in actuality *another* 35 growlers are being added by 2018 for a total of at least 70 added, making a total number of growlers on Whidbey Island 153. Therefore all of the calculations in the DEIS are incorrect and vastly understated.
82 here now, plus 35 more for 118 total discussed in EIS, PLUS another 35 by 2018 not mentioned in the DEIS, for a total of 153.

*At the Navy's Open House public meeting on Lopez Island on December 7, 2016, I had a chance to talk to a senior officer in uniform who I learned was from Norfolk, VA (Naval Facilities Engineering Command Atlantic?). He informed me that there were currently over 100 Growlers already stationed at NASWI, and that the number would increase to roughly 160 when all the procured Growlers were

manufactured, tested, and flown one by one to Whidbey Island. Based on the draft EIS, there will be a maximum of 118 Growlers in active operations. If the total number of procured Growlers to be stationed at NASWI is 160 as I was informed by the senior officer, this means the remaining 42 Growlers will be "spare"? Given the costs involved, it is difficult to believe that 42 spare Growlers are needed for an active fleet of 118. Is it possible that additional Growlers may be further added to the current proposed addition of 35-36 Growlers to the existing 82 in active operations? If so, why is there no mention in the current EIS process? If not, what kind of maintenance routines would be needed to keep spare Growlers in good working conditions year after year? Do they have to be "run" occasionally to keep engines in working order? At a minimum, the draft EIS should include a description of the maintenance routines of these spare Growlers and an analysis of their potential environmental impacts, including noise and air emissions.
*Recommendations: The Navy should provide details regarding plans for all the 160 Growlers at NASWI in the draft EIS, at least for the accumulative impact analysis to be complete and meaningful. The draft EIS should also include impact analysis of the maintenance routines of spare Growlers.

CONCLUSIONS

The summary of the draft DEIS for EA-18g airfield operations in section 6.1 states that the DEIS complies with National Environmental Policy Act, NEPA. It does not.

The Navy DEIS has simply reproduced studies that document the already well-known impact of excessive noise on human activities, and does not address incremental impacts of the additional aircraft.

None of the items in section 2 above have been addressed in the DEIS.

None of the following have been addressed in the DEIS:

- NEPA Sec. 101 [42 usc.4331] states that NEPA shall "assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings."
- NEPA 40 C.F.R. 1502.13 states that effects and impacts shall include "ecological, aesthetic, historic, cultural, Economic, social or health"
- The NEPA process - Sec. 1502.14 Requires Alternatives including the proposed action.

- Sec. 1502.23 Cost-benefit analysis.

If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences. To assess the adequacy of compliance with section 102(2)(B) of the Act the statement shall, when a cost-benefit analysis is prepared, discuss the relationship between that analysis and any analyses of unquantified environmental impacts, values, and amenities. For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations. In any event, an environmental impact statement should at least indicate those considerations, including factors not related to environmental quality, which are likely to be relevant and important to a decision.

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

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

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

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

1. **Name** [redacted]

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

   Resident

3. **Address** [redacted], Coupeville 98239

4. **Email** [redacted]

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

Comments

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 a home owner in the flight path of OLF. This property has been in my wife's family for 150 years. When the Growlers fly my wife becomes anxious and fearful. The worst part of it is the anticipation of how the noise affects her sleep and emotions

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Prepared by Coupeville Community Allies
January 18, 2017

January 25, 2017

EA-18G EIS Project Manager
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Pioneer, CA 95666

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex (DEIS). I can appreciate the time and effort that went into preparing the DEIS. Unfortunately, the DEIS falls far short in being able to fully inform the Secretary of the Navy about the actual level of community annoyance that is already being caused by the noise generated from the existing Growler training flights. I also believe that the DEIS fails to fully disclose how community annoyance levels will dramatically increase, especially in outlying areas, under the implementation of any of the action alternatives presented in the DEIS.

If the Secretary of the Navy is going to make a decision about adding additional Growlers to the Whidbey Air Station with the resultant increase in the number of training flights, then I would hope that decision would be based with full knowledge about the severity of the noise impacts created by the Growlers. The EA-18G is perhaps one of the loudest military jet aircraft ever developed. NEPA is about making informed decisions, and the DEIS barely scratches the surface in regards to the actual noise disturbances currently being caused by these extremely loud and terribly annoying aircraft.

The EA-18G may be exciting to fly for the young pilots, but when flying overhead the low frequency roar and rumble that emanates from the jet engines of this aircraft is very disturbing to the simple folks trying to live their lives on the ground. The name "Growler" is a vast understatement. It alludes me as to why the Navy desires to fly, over highly populated areas, a plane that is this incredibly rude in it's loudness. The Navy is not being a good neighbor to our local communities. Instead the Navy has their head stuck so deep in the sand that they can not hear the obnoxious unearthly roar that is coming out of their EA-18Gs.

From data given in the DEIS, it is difficult to try to compare the sound levels that emanate from the EA-18G Growler to other types of existing aircraft whether civilian or military. I realize that the FAA does not regulate military aircraft, but I would like to see the noise levels of the individual Growler expressed in the DEIS in the same manner that the FAA measures and approves noise levels that are generated from commercial aircraft. That would give some commonality for reasonable comparisons. Currently, the FAA mandates that nearly all aircraft that fly within the United States comply with their Stage 3 noise requirements. Does the Growler even meet the old FAA Stage 1 noise requirements?

I believe that if the Growler was flying out of commercial airports, then the FAA would prohibit it. Does it not seem that what is appropriate for commercial aviation should be appropriate for the military when using airfields adjacent to highly populated areas even if not expressly required by law? In particular, since the computer noise simulation models used in the DEIS were developed to describe noise and the resultant levels of community annoyance adjacent to commercial airports, is the DEIS using the correct aircraft noise baseline levels as input into a model developed for commercial aviation? It seems to me that the Growler EA-18G is so very loud in relation to commercial aircraft that it would blow past any normal assumptions made by the Day Night Level (DNL) computer modeling. This makes all of the computer model outputs in the DEIS suspect as not truly reflective of the existing condition let alone what would result from increasing the number of Growlers based at Whidbey.

The DEIS is of particular interest to me as I own property on Lopez Island in San Juan County. I purchased that property in order to enjoy a rural lifestyle away from the bustle and noise of busy urban environments. Lopez Island is a small community that values a natural environment composed of predominately quiet agricultural and non-industrial activities. But since the Navy began conducting training flights using the EA-18G Growler aircraft, out of the airfields of the Whidbey Naval Air Station, disturbance due to military jet noise along with correlated levels of community annoyance has increased dramatically on Lopez Island. It is difficult to simply ignore the roar of the military jets passing overhead at low elevations. The noise levels and the number of low level flights over Lopez Island now greatly exceeds what was occurring just a few years ago when the Navy was flying the EA-6B aircraft out of Whidbey for the same type of training missions. In analyzing the noise effects of the no action alternative, the DEIS should disclose existing conditions from a few years ago before Growler deployment.

The 65 Db DNL contour maps shown in the DEIS do not even reach over Lopez Island. Thus, the DEIS seems to contend that (using the Schultz and Finegold annoyance curves presented in the DEIS Appendix) that the number of highly annoyed residents on Lopez Island would be far less than 15% of that population. I personally know that many residents of Lopez Island indeed are highly annoyed by the noise currently being generated from the existing Growler over-flights and many of those residents have submitted complaints to the Navy. Consequently, the contention of the DEIS that Lopez Island has very few highly annoyed residents seems incorrect. Either the computer noise models in the DEIS are misleading in predicting levels of community annoyance or the residents of Lopez Island with whom I have discussed this issue are not being frank with me. I tend to side with the actual residents then the alternate reality of the computer models. Many residents of Lopez Island are more highly annoyed by the Growler over flights than is reflected in the DEIS.

Lopez Island sits 10 miles from the Whidbey air fields, yet the once quiet and peaceful Lopez Island community is being significantly impacted by these very loud military Growler jets. Community annoyance levels will likely increase dramatically and the quality of life on Lopez Island will decrease under any of the action alternatives in the DEIS. This issue is not being analyzed adequately in the DEIS.

Through the use of DNL contour maps, the DEIS attempts to disclose the amount of annoyance that is currently occurring to residents of local communities due to these Growler over-flights. The DNL contour maps are generated by a computer noise simulation model that does not seem to correlate well with the actual community annoyance levels in the "real world" in outlying areas like Lopez Island. And the DEIS does an extremely poor job of explaining how the computer generated DNL contour levels portend to correspond to the predicted levels of community annoyance. The DEIS should instead portray these DNL contours as community annoyance levels to make the intent of these contours more meaningful to those reading the DEIS.

Why did the DEIS not conduct any social surveys in the local communities about the actual noise impacts of these extremely loud and annoying military jets? Why does the DEIS estimate "theoretical" annoyance levels only through the use of computer models instead of actually surveying and polling the local communities that are being so affected? Perhaps surveying real people is too big of a dose of reality for the DEIS that surrounds itself in computer simulations that underplay the actual level of annoyance. Why does the DEIS not summarize the numerous noise complaints that the Navy has received about the Growler over-flights and present that information in terms of "real" community annoyance levels? The DEIS does show that during the 2014-2015 DEIS scoping efforts, 85 percent of the total comments received were against the proposed action. Maybe it is time for the analysis in this DEIS to sit up and take notice to what our local communities are actually trying to say to the Navy.

My father served in the Navy during World War II and I am very proud of his service in that regards. I understand the necessity of military training, but that training should not be conducted at the expense of the emotional health and well being of the people living in neighboring communities. The Navy has become the neighbor from hell in regards to their use of the Growler. When the Navy so annoys and angers the local citizens they are trying to protect, then the purpose and need for their low level training flights no longer becomes relevant.

The United States Supreme Court in United States v. Causby (328 U.S.256) held that the U.S. Government was liable to property owners for the noise impacts from military aircraft. In that particular case, the plaintiffs argued that their property was taken (within the meaning of the Fifth Amendment of the US Constitution) by the U.S. Government as the plaintiff's property was no longer able to serve it's intended purpose (a chicken farm in this case) due to excessive military aircraft noise. Now I am not a chicken farmer and I do not claim to have any rights to the airspace above my parcel, but many have purchased property on Lopez Island (where I own property) as a place of quiet residential refuge. The low level Growler over-flights have taken, for many, their property away from it's intended use. The Growler over flights limit the utility that a private parcel may have to the land owner and the residents.

Consequently, the low level Growler training flights have caused a diminution of the value of property in the local communities. This issue is not addressed in the DEIS. This is a diminution of a parcel's value in the sense that it may no longer serve as a place to experience a quiet natural environment. Either a resident has to live with the awful noise or move. This is especially problematic for those that have lived for years on their parcels without previously suffering the annoyance of loud low level Growler over flights. The DEIS does not address how the Navy plans to compensate land owners in local communities for the loss of the utility of their private parcels, especially in outlying areas that were previously without much military jet noise.

Freedom from excessive air and water pollution is one of the freedoms we have in the United States. Extreme aircraft noise is a recognizable form of pollution to the human environment. The EA-18G Growlers are not the "sound of freedom" but rather the sound of freedom being taken away. It is a right of any citizen of our country to be free from the disturbing activities of their neighbors when those activities result in the degradation of the environment within and around one's private property.

The EA-18G Growler aircraft is probably one of the loudest military aircraft ever designed and flown. The DEIS does not discuss what possible purpose there is to have an aircraft that emanates such excessive noise levels. The DEIS does not discuss if there is a strategic advantage to having an aircraft that is so extremely loud. Is the Navy and it's contractors so technologically unadvanced that they can not develop a quiet aircraft that would not disturb their neighboring residential communities? The DEIS does not explain why the Navy mission is so important that they have the right to deny their neighbors the freedom of quiet skies? The Navy is fouling their own nest and this is a nest that residents of our local communities are being forced to reside in alongside the Navy.

Environmental noise affects the human environment primarily through it's adverse psychological effects. The DEIS makes note of this issue and the military certainly understands the psychological impact of noise. For years, the military used noise to break down the will of enemy combatants. That practice has been curtailed by the military to the best of my knowledge as it was deemed to be a form of torture. Not torture that caused physical harm, but rather torture that affected the human psyche. The DEIS is not correct in presuming that if the noise from the Growler training activities is not causing measurable physical harm (like permanent hearing loss or heart attacks) then there is no significant affect of those activities on the human environment. The issue here is annoyance and annoyance leads to stress which leads to a diminution in one's quality of life.

The psychological impacts of the Growler noise on residents of local communities is not adequately addressed in the DEIS. The fact that many residents of San Juan County (including Lopez Island) are significantly annoyed by the training flights of the Growler is demonstrated by the thousands of complaints that have been registered with the Navy about the excessive jet noise that emanates from the EA-18G Growler when flying overhead. The complaints are even more numerous from those living closer to the Navy air fields on Whidbey Island. Living in proximity to either of the Navy airfields at Whidbey must be awful. Yet, the DEIS turns a deaf ear to the complaints. The sheer number of existing complaints would help to describe in the DEIS the actual level of psychological long-term annoyance that is occurring due to the existing Grower training flights. Those complaints will increase dramatically under implementation of any of the action alternatives in the DEIS.

The DEIS looks to computer noise models without conducting any actual on-the-ground verification of the outputs of those models. This downplays the true impact that the EA-18G training flights are having on the human environment. Whether or not this military jet noise is causing physical damage to one's hearing or causing hypertension or heart attacks is irrelevant. The long term annoyance, the increased stress levels and the psychological impact is what is critical and what needs to be measured and portrayed in some relevant manner in the DEIS. The high levels of annoyance caused to local communities by the Growler over flights results in a significant reduction in the quality of life for local residents.

Unlike a computer model, I can tell you from experience that the noise generated by the existing low level military training flights that take place over Lopez Island by the Growlers are significantly disturbing to many people and visitors to the island, including myself. If the Growler aircraft were not so terribly loud and annoying, then there would not be thousands of citizens currently complaining to the Navy about the noise impacts under the Growler flight paths. I would love to look up and see a military jet aircraft passing overhead and marvel at it's stealth. Instead I have to cover my ears in annoyance when a Growler passes overhead. It leaves me furious, annoyed and angered for hours at a time as a result of being so unwillingly disturbed by the jet noise and unexpectedly interrupted in my daily activities. I feel held down and hopeless from the assault of the noise, as do others.

The psychological impacts of the noise intrusion generated by the Growlers lasts far longer than the actual time period of the over flight. The DEIS Appendix points out that an individual's level of annoyance is influenced greatly when that person does not understand the necessity of the noise or believes that the noise is otherwise preventable. Levels of annoyance are also influenced by the predictability of the noise. In this regards, the DEIS makes no case as to why the noise being generated by the Growlers can not otherwise be prevented nor why flight schedules can not be more consistent.

A loud freight train passing by everyday at noon can be tolerated. Tolerating military jet noise that can occur anytime during the day or night is more problematic. But there may be potential solutions. Things like flying at higher elevations over out lying areas, working with the FAA to change flight paths away from outlying residential areas to areas over open water, not using jet engine afterburners, or changing jet engine designs are all potential solutions to this issue. None of the DEIS actions alternatives include any specific mitigation of this sort. The DEIS only indicates that these are mitigation measures that could be considered but otherwise not actually implemented with any of action alternatives.

The use of computer noise simulation models, in the DEIS, such as NOISEMAP to describe existing and future noise impacts, created by the Growlers, does not present, to the Secretary of the Navy, a true picture of the noise levels that would be wrought upon residents of local communities by stationing more Growlers at the Whidbey Naval Air Station. My understanding is that a Department of Defense report found that NOISEMAP is outdated and does not provide scientifically and legally defensible noise assessments of the high-thrust jet engines used in the Growlers? If so, then why does the DEIS use NOISEMAP?

The DEIS should better quantify the level of noise and the time periods and frequency of events actually occurring on the ground with in-situ sound pressure level monitoring rather than questionable computer simulations. Actual on the ground sound pressure level monitoring and actual verifiable accounts of the number of existing over flights occurring needs to be conducted not only adjacent to the Navy air fields but also in outlying areas. I am particularly concerned about the number of existing Growler over flights at the San Juan Islands National Monument located on Lopez Island which is listed as Point 10 in the affected environment of the DEIS. Without a good environmental baseline, the analysis of affects of the alternatives carried forward in the DEIS is faulty.

For example, I believe that P10 currently receives more than the 372 annual noise events per year shown in the DEIS. The Lmax of a EA-18G Growler flying only a few thousand feet above P10 is likely greater than 85 dB. There is a computer programmer's adage that states "garbage-in-garbage-out (GIGO)". The computer noise simulation models used in the DEIS are subject to GIGO. Because the noise data input into the computer model is not correct for the existing condition and because the actual number of over flights currently occurring in outlying areas is not accurate, then any predictions by the DEIS of the noise levels occurring under the action alternatives will subsequently also not likely be correct. None of this can be verified without actual on the ground measurements and a review of accurate existing flight records of the Growlers under the existing condition.

As another example, the DEIS shows that there is no probability of awakening from sleep for residents living near point SO5 (Lopez Island School). Now I personally know someone that lives near SO5 and who has reported to me numerous times that her sleep has been interrupted by the existing Growler over-flights. Maybe the DEIS should have actually questioned local residents if their sleep was being interrupted rather than using computer noise models that incorrectly estimate that there should be no such sleep disturbing events currently occurring due to existing Growler over flights. In rural areas, people often go to bed by 8PM or 9PM and get up at sunrise and this does not seem to be addressed in the sleep interruption predictions made by the DEIS.

I applaud the DEIS for using SEL, Lmax and Number of Annual Events to represent the noise impacts currently occurring and potentially occurring around schools and other points of interest in our local communities. Two of the points that I am most familiar with are Point 10 in the DEIS (San Juan Island National Monument at the south end of Lopez Island) and Point SO5 (Lopez Island School). But it is obvious to me from personal experience that the computer models are not correctly predicting the SEL, Lmax or the Number of Annual Events actually currently occurring at these points. The DEIS gives no evidence that the noise estimates and event estimates are correct.

Particularly misleading in the DEIS is the use of Day-Night Noise Level (DNL) to represent the potential for long term annoyance to local communities affected by the Growler over-flights. DNL was developed to analyze the noise impacts at commercial airports that operate 365 days a year. DNL does not seem appropriate for quantifying the effects of intermittent but intensive military jet flight noise occurring over otherwise quiet rural areas. Noise level averaging incorrectly assumes that the quiet days or hours mitigate for the noisy days or hours over the long run. I say that is hogwash if one is looking at otherwise quiet environments.

Let say that I blasted the Secretary of the Navy's quiet country residence with ear deafening noise 10 times per day for 5 minutes at a time (think Harley motorcycle without exhaust pipes). Could I defend myself from a harassment law suit by claiming that if averaged over the whole day then the noise that I was generating would only constitute the equivalent annoyance level of a bird chirp? Ridiculous of course, but that is what the DEIS is doing when using DNL to disclose the potential annoyance level to local residents from increased Growler flights especially over normally quiet rural areas. The DEIS should directly question and survey those residents about their annoyance levels and summarize the results accordingly.

The DEIS should have fully analyzed and carried forward at least one other action alternatives for stationing the Growler aircraft at a more remote airbase where noise disturbances would not be as severe as is currently occurring to the communities surrounding the Whidbey Naval Air Station. Although the action alternatives fully analyzed in the DEIS may meet the purpose of the DEIS to "augment the Navy's existing Electronic Attack community at NAS Whidbey Island", the need of the DEIS "to maintain and expand Growler operational readiness" is not being meet by the narrow range of alternatives analyzed in the DEIS.

In order to meet the stated need of the DEIS, all opportunities to achieve "Growler operational readiness" should be fully analyzed by examining other possible Growler flight training operational sites at a more remote airfield than is Whidbey, such as China Lake. The cost and convenience reasons given in the DEIS are weak at best for not fully analyzing other Growler base locations. By fully analyzing alternatives for stationing all or some of the Growlers at a more remote airbase or conducting training at a more remote location, then the Secretary of the Navy would be given a chance to select an alternative that results in less noise disturbance to our local communities. One of the reasons that we have remote military installations is to enable the military to test their weapons and equipment and conduct training without otherwise impacting local communities. Why is the Growler training flights any different? One would hope that the Navy would want to move their show away from the general population rather than force residents to unwillingly suffer from the Navy's environmental noise pollution.

The DEIS also does not examine alternatives for reducing the actual number of Growlers stationed at the Whidbey Naval Air Base without otherwise needing to base Growlers at a different location. The DEIS states, "It would be unreasonable to continue considering alternatives that evaluate fewer aircraft than Congress has appropriated; therefore, these alternatives were removed from further analysis." There is no logic in that statement in the DEIS. Apparently the Navy has way more appropriations then they know what do with. How many Growlers are truly needed to accomplish "operational readiness"? How many Growlers have been deployed in the past and against what enemy? Do terrorist organizations have the types of sophisticated electronic communication that we anticipate will need to be destroyed? Against what nation or enemy will hundreds of Growlers conducting electronic warfare be needed? The DEIS makes no case for the necessity of having so many EA-18G Growlers in the arsenal and the DEIS makes no explanation as to why a quieter aircraft could not serve the same purpose.

If the Navy has extra Growlers due to the loose purse strings of Congress, then why not just put them in a hanger as reserves?. And if the Navy is so flush with appropriations, then why is the cost of moving the Growler airbase even an issue? How about not ordering as many Growlers and moving the Growler training airbase to a more remote location with the savings? Such an alternative is not fully analyzed in the DEIS.

The DEIS also makes no mention as to why such a loud aircraft as the EA-18G needs to be used for electronic warfare. Would not a stealthier aircraft have a greater strategic advantage? The Navy should have specified a quieter aircraft if they wanted to station them at Whidbey or instead develop methods to reduce the extremely loud roar that is generated by the Growlers when flying overhead. What is the Navy thinking by flying this loud of an aircraft over heavily populated areas? Why did the DEIS not develop an alternative that would examine the use of a quieter military aircraft rather than harassing neighbors with the Growler?

I would suggest that it is time for the Navy to go back to the drawing board in regards to the EA-18G aircraft and develop a quieter version of this military jet that would be welcomed instead of reviled. The DEIS should discuss alternative aircraft that might reduce ongoing and future noise impacts of the electronic warfare training activity being conducted out of the Whidbey Naval Air Station.

The DEIS does not fully develop a comprehensive range of mitigation measures that could reduce the noise impacts of the EA-18G training flights. An integral part of the NEPA process is not only describing the adverse environmental effects of a proposed action, but also incorporating mitigation measures into that action to reduce those environmental effects. Although the DEIS gives mouth to potential mitigation measures, none are expressly incorporated into the action alternatives presented in the DEIS. Thus, there is no guarantee that the Navy will actually attempt to mitigate their noise impacts. This may include redesigning the aircraft, replacing the engines, or changing flight paths away from residential areas or flying at higher elevations over outlying areas. But whatever mitigation is developed, it needs to be part of the decision rather than outlined as something that the Navy may or may not be do in association with any decision made using this EIS process.

Any decision made, based on the DEIS, would be capricious and arbitrary without further disclosure of how the noise, of the Growler training over-flights, is truly affecting the annoyance levels and the subsequent well being and quality of life of the residents in local communities. I urge you to revise the DEIS to correct these inadequacies in the analysis. Be truthful. The DEIS should let the Secretary of the Navy know the true impact of the noise disturbances caused by these Growler training flights to local communities before a decision is made. If the Secretary of the Navy wants to ignore the noise issue after being fully informed about it in the Final EIS, then so bet it, but to make a decision in ignorance is not bliss- but instead violates the very foundation of NEPA.

Sincerely,

[redacted]

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation [redacted]

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

   Action: Recognize the health impacts of Growler noise on health as documented in the World Heath 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:

This is an assault on our environment.

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

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

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

1. **Name** [redacted]

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

3. **Address** [redacted] Coupeville WA 98239

4. **Email** [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)

- ☐ **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 noise is terrible now without the increase

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

[redacted]
Seabeck, WA 98380
February 9, 2017

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

Attn: Code EV21/SS

Dear Sir/Madam,
Thank you for extending the comment period to February 24, 2017 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.

We find it incomprehensible that the Navy is pushing relentlessly and with some dishonesty for the right to use the areas noted above for EA-18G Growler practice. It has previously been pointed out that there are other areas in the United States that the Navy can use for their Growler activity that would not have the adverse effects that would be accrued within the Olympic Peninsula – areas that do not include a national park that is a UNESCO Heritage Site, relatively densely populated areas with small populations in between, nor sensitive natural ecosystems.

The following are some of our main concerns. Numbers in parentheses refer to the attached document prepared by the West Coast Action Alliance.

First, the importance of maintaining the integrity of the Olympic National Park as it was originally intended. The Olympic National Park was established in 1938 as an ecosystem preserve to be honored and respected by all visitors in-perpetuity. It was nominated in 1981 as a UNESCO World Heritage Site and subsequently accepted. To be included on the World Heritage List, "sites must be of outstanding universal value and meet at least one out of ten selection criteria. The Olympic National Park met two of these criteria: ***Criteria vii:*** to contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance. ***Criteria ix:*** to be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals." ***According to the World Heritage Center, "protection and management, authenticity and integrity of properties are also important considerations."*** The Olympic National Park is listed in both "cultural" and "natural" criteria of Operational Guidelines of the World Heritage Center for 2002 and 2005.

Noise and activity by the EA-18G Growlers would have a deleterious effect on the integrity of this unique ecosystem and its inhabitants to include the human residents of this area and "[t]hreatened and endangered species, sensitive species, and other wildlife and critical habitat areas" that would be "adversely impacted by noise from takeoffs, landings, and other flight operations well beyond the Navy's study area" (25).

Second, the people and wildlife who live in the areas that would be affected by Navy Growler noise and activity. This would include the Olympic Peninsula, within which is the Olympic National Park, the communities of LaPush, Queets, Kalaloch, Clearwater, the Hoh village, Neah Bay, Forks, Port Angeles, Whidbey Island, Camano Island, Port Townsend, San Juan Islands, and small communities therein. The study area of the effects of Growler noise documented in the Navy's Draft Environmental Impact Statement (DEIS) included only "6-10 miles of the corners of runways", ignoring the effects of Growler noise outside this narrow study area. This noise would include that from afterburners of the jets during aerial combat maneuvers (dogfights, etc), flying at low altitudes, practicing landings on short runways, having weaponry that can make a "parcel of forest hum with electromagnetic energy", and low-frequency noise "produced at tremendous levels by Growlers" (1, 12, 13).

The US Dept 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 dB as being 'unacceptable'. Residents in these outlying areas (noted above) . . . have recorded noise at least twice that loud". Guidance directing aircraft from the Aircraft Environmental Support Office was quoted by the DEIS and states that "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1500 AGL. Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." The Navy did not disclose these low-flying guidelines 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. For public health and safety reasons, the Navy must revise its guidance to <u>significantly</u> increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1000 feet is far too close, and 1500 feet over an airport is far too dangerous a proximity to supersonic Growler jets" (2, 17, 18).

Third, the effects of the Navy's use of hazardous chemicals and materials, such as firefighting foam and perfluorooctane sulfonate, aqueous film forming foam, and perfluoroalkyl substances on ground water, drinking water, and

soil have not been honestly acknowledged nor appropriately analyzed by the Navy in their DEIS (4, 22, 23 24). These highly toxic carcinogenic chemicals will not only affect the people in these areas, but also the terrestrial, fresh water, coastal and marine ecosystems and the organisms that live within them. (Note criteria ix of the World Heritage List mentioned in paragraph 4)

Fourth, the purposeful attempt by the Navy to mislead the public by circumventing the law regarding public disclosure and input, deliberately leaving out important information, not disclosing new information regarding impacts of its activities, avoiding implementing impact studies and analysis, using old studies and outdated computer models to support their position, illegally piecemealing and segmenting projects and impacts on wildlife to avoid analyzing cumulative effects, and violating the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) is COMPLETELY UNACCEPTABLE!

We leave you with this final thought:
"One square inch of silence" is a concept investigated by its creator Gordon Hempton. In his book of the same title, he writes: "In the spring of 2005, my hearing restored, my career as the Sound Tracker back on track, I asked myself, 'What good is perfect hearing in a world filled with noise pollution?' After a good bit of thought, I resolved to make good on a quiet conservation project I'd conceived of years earlier."

"One Square Inch of Silence was designated on Earth Day 2005 (April 22), when, with an audience of none, I placed a small red stone, a gift from an elder of the Quileute tribe, on a log in the Hoh Rain Forest at Olympic National Park, approximately three miles from the visitors center. With this marker in place, I hoped to protect and manage the natural soundscape in Olympic Park's backcountry wilderness. My logic is simple and not simply symbolic: *If a loud noise, such as the passing of an aircraft, can affect many square miles, then a natural place, if maintained in a 100 percent noise-free condition, will likewise affect many square miles around it. Protect that single square inch of land from noise pollution, and quiet will prevail over a much larger area of the park.*" (Emphasis ours)

In a conversation with Kurt Fristrup, an ornithologist at Cornell University stationed at Fort Collins, Colorado to help improve the Natural Sounds Program's data-collecting and analysis methods, Fristrup shared a final thought before Hempton left his office: ***"The loss of quiet is literally the loss of awareness. Quiet is being lost without people even becoming aware of what they're losing. It's tragic."*** (Emphasis ours)

A continuation of our concerns about the Navy using the Olympic Peninsula as a playground for their EA-18G Growlers is included within the following attachment prepared for the public by the West Coast Action Alliance, a summarized analysis of the 1400-page document of the Navy's Growler Environmental Impact Statement (EIS). We have highlighted specific sentences for emphasis.

Sincerely,

[redacted]

On a personal note: As a young child, I lived with my parents in a small apartment in the attic of the Queets-Clearwater School in the late 1940's. My parents were two of three teachers; my father was also the principal. This was an isolated area and teaching here was considered a hardship post so my parents received a little extra salary. The road to Forks hadn't yet been completed. The drive to Hoquim and Aberdeen was long and slow on a narrow 2-lane highway accommodating huge, fast-moving log trucks and slower passenger cars. The highway went through the Queets Village splitting it in two. Kalaloch Lodge had a small café mostly visited by the locals and offered only a few cabins overlooking the ocean.

This was a very transforming experience for me as a young girl deeply affecting me in all areas of my life. The quiet, peaceful, cathedral-like energy of the surrounding forests and the ever-changing energy of the ocean became an integral part of me. The sound of silence among the trees, bugling of rutting elk in September, a solitary scream of a cougar in late afternoon, the chorus of tree frogs on a spring night, and the scratchy scuttle of hermit crabs on my approach are audible memories. As an adult, I have returned to my place of childhood every year seeking that peacefulness and energy I know so well. I have not welcomed the changes I have observed over the years – large areas of trees I had known are gone and it's more and more difficult to find a place to wander with few or no people. This is the ancestral home of the Quileute and the Makah. This is not only their home, but also a sacred place. So it is for me.

Attachment: Summary analysis of the Navy's EIS by the West Coast Action Alliance

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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 accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

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

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

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

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

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to 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~~ #7 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 scienc*e. This DEIS fails that test.

Thank you for considering these comments.
Sincerely,

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation SES Center for Sustainable Agriculture

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

_____

_____

_____

_____

_____

_____

_____

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)

   resident

3. **Address** [redacted] Coupeville, WA 98239

4. **Email** [redacted]

5. **Phone** [redacted]

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

Comments

Check all that concern you. For additional information see www.facebook.com/whidbeyeis

☒ **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 live 1 mile from The OLF and already experience the impact of 6100 flights/yr - they often fly from 10-12pm & it is difficult to get to sleep. (NOISE) When I ride my bike down The road, I have to literally stop to cover my ears. I am fearful of our property values as I doubt That I would be able to tolerate 35000 flights & concerned about our community which includes a High School & hospital & many businesses catering to the tourist community. We already know That our water has been contaminated as well. I am very sad & scared.

What else you can do

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

To Learn More

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

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

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

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

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

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

1. **Name** [redacted]

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

   resident

3. **Address** [redacted] Coupeville WA 98239

4. **Email** [redacted]

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

Comments

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

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

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

(over)

- ☒ **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 member of The local Audubon Society and am concerned there is no mention in The EIS about the effects on our birds and other wild life. What is your plan to protect The habitat here - especially The multiple IBA's (Important Birding Areas) - at least 4 here on Whidbey alone?

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

Prepared by Coupeville Community Allies
January 18, 2017

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

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

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

1. **Name** [redacted]

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

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- ☒ **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 wife is a teacher in the public school that is in range to be effected by the noise levels of the loud & numerous growlers you are thinking of placing in Coupeville. It is already incredibly difficult for these kids to learn. The school is relatively new. How will you mitigate the noise levels in this school which was not built to handle this level of noise.

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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

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

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

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

1. **Name** [redacted]

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

   resident

3. **Address** [redacted] Coupeville WA 98239

4. **Email** [redacted]

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

Comments

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

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

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

(over)

- ☒ **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 work at the local hospital on Whidbey & we are in the midst of adding a new wing to the building. Why was there not a plan to address this level of noise discussed earlier for the new wing & what will you do to ~~[illegible]~~ take care of this? How do you expect patients to heal/sleep with 135 flights per day & how do you expect the employees to deal with this stress? Do you care?

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Please include any additional comments and concerns here:

I understand the Navy has already ordered more growlers to make a total of 160 + planes to place them all on whidbey - I'm concerned about the folly of placing all the fleet of electronic warfare jets on one base - especially so far away from the East Coast bases - but more especially for the sake of security. We are a vulnerable island and are at risk of attack.

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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Prepared by Coupeville Community Allies
January 18, 2017

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)
Resident (former)

3. **Address** [redacted] (current address [redacted] Freeland, WA 98249)

4. **Email** [redacted]

5. **Phone** [redacted]

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

Comments

Check all that concern you. For additional information see www.facebook.com/whidbeyeis

☒ **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 lived in a trailer in coupeville which often rumbled and echoed in the presence of jetnoise. I could not maintain conversations indoor or outdoor and was often forced to leave the property during flights to conduct business. Late night flights left little options and sleeplessness.

What else you can do

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

To Learn More

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

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

[redacted]
Coupeville WA 98239
January 24, 2017

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

I live in Coupeville near Crockett Lake, in noise zone 2. In 2008, we built our home in accordance with the noise standards required by Island County. At the time we built, Prowlers flew occasionally and they were loud. We accepted that.

When Growlers started to fly, we noticed an increase in noise and also noticed that the planes were often directly or almost directly overhead. Sometimes we can see the pilot's head, suggesting the planes are lower than 200'. When the planes are flying near us, we cannot hold a conversation indoors, talk on the phone, watch television, or listen to music, let alone work or sit outside. We purchased hearing protection and wear it indoors when the planes fly. I have measured Growler sound levels over 100 decibels in my home, with the windows closed, in Noise Zone 2. Because this is a fairly infrequent occurrence, it is unpleasant but tolerable, especially when notice of the flights is given and we can leave the area.

If there are going to be many more planes, flying much more often, life for many of us on central Whidbey Island will become frequently miserable. Stress is a cumulative thing, and the noise is very stressful. Averaging decibel levels over 24 hours or 365 days is not an accurate reflection of the noise exposure, and yields a meaningless number. When four or five planes are flying in a loop, the noise is continuous, painful, and prolonged. Increasing this exposure by a factor of almost ten will cause grave economic harm as people who live here leave the area and the value of properties plunges. It can also cause physical harm: Central Whidbey farms employ outdoor workers, some low-income, who are exposed to extreme noise levels every time the planes fly. Repeated loud noise over the Coupeville schools interrupts teaching and stresses students. Children play on public fields directly beneath flight patterns.

Birds and animals have more sensitive hearing than humans; great increases in noise can affect their health, migration, breeding success and behaviors. Planes have the option of flying elsewhere, but many birds are hard-wired to stop at Crockett Lake and other locations on Whidbey Island on their flights north in the spring and south in the fall.

No increase in carrier-based planes; no increase in OLF flights. Move all training flights to less-developed areas. Replace all PCOS firefighting foam; monitor groundwater around Ault Field and OLF and replace water sources for all affected wells. Test Crockett Lake and Swantown Lake; mitigate any pollution.

Sincerely,
[redacted]

Diana B. Sheridan, page 1

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation QUIET SKIES / CITIZEN of LOPEZ IS., WA

4. City, State, ZIP LOPEZ ISLAND, WA 98110

5. E-mail [redacted]

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

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

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

    Please see following page (4) for my comments.

12. Add your own comments:

Lopez Island, the place my husband and I call "home," has been radically transformed by the number of EA-18G "Growler" jets flying over our island. Just a few days ago we were utterly startled by these planes as they flew over Lopez Village, even lower than usual. By day and by night, our lives are being altered in such a dramatic way that we worry about the impact to our hearing, to our general health and to our mental capacities.

Having examined the current EIS draft, we agree that there is a definite need for a more comprehensive examination of the specific 11 items listed above. With the seemingly increased number of regularly scheduled flights where we live, we note that the jets appear to be flying at a louder and lower altitude. The consequence for us (we are in our 70s) is that our sleep patterns are always interrupted and the resulting anxiety prevents us from getting back to sleep. Having lived decades ago in a war zone in the southern Philippines where military planes and helicopters often flew overhead, our family including our children were rattled and fearful then; and we now find ourselves living through a similar scenario once again. The frequent jet noise not only causes us to revisit a time of trauma for our family, but it also now causes us pain and suffering due to the abrupt interruption of very loud rumbles which prevent us from doing the creative work we each respectively had hoped would define this part of our lives as writer, artist and musician. This anxiety has altered the very basic functioning of our lives.

Likewise, the tremendous jet noise at a high vibration frequency apparently has a noticeable impact on the wildlife of our island habitats. As an artist who works out doors, I find the noise unbearable to the tranquility I need to do my work. The animals and birds that I focus on are always fewer in numbers whenever the jets fly overhead. How can this disturbance to work, creativity and animal life be measured?

I am not a scientist so I am registering my concerns from the perspective of a citizen whose daily life has been significantly, and I fear permanently, changed by the EA-18G jets.

Thank you for giving me this opportunity to express my lived concerns as a citizen trying to survive under this umbrella of jet noise. I am also concerned for the safety and welfare of my entire community, for it is all of us together who are committed to making ours a thriving and healthy community for all.

[redacted]
Lopez Island, WA 98261

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

January, 2017 Comments

Fill in and mail with comments to:

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation Quiet Skies · Lopez Island

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

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12. Add your own comments here:

_____

_____

_____

_____

_____

_____

_____

EA-18G Growler
EIS Project Manager Naval Facilities
Engineering Command Atlantic

Attn: Code EV21/SS

Comment on the DraftEIS

I am a long time resident on Whidbey Island. My family has owned land in Central and North Whidbey long before the Navy became a presence on Whidbey Island.

Increased flights at OLF will put farmers out of business because they and their workers will not be able to tolerate the unbearable noise as they attempt to work under the flight path. Bed and Breakfast businesses and tourism, the life-blood of Central Whidbey, will be dramatically, negatively impacted (as we have already heard from our friends who own such a business). Increased flights at OLF means a greater risk of crash and with it the certainty of more frequent
use of the foam containing PFOA's which is poisoning our local wells. This issue has been discovered AFTER the EIS was written. A fact which should require the whole process to be re-evaluated and re-written (at the least). The water pollution is a big concern for we who are drinking it.

Finally, two months ago, the United States, once again recognized the agonizing moment of the attack on Pearl Harbor, where so many valuable U.S. Assets were lying in the harbor, an easy target. WHY on earth would we want to make the same mistake yet again and position ALL of our expensive and valuable Growler assets in ONE place. This makes ABSOLUTELY NO SENSE STRATEGICALLY! If you care nothing for the destructive impact you will have by increasing flights at OLF, at least consider the unwise strategy you are embarking on. You will be putting a big target on the backs of every single man, woman and child living here. If you can't be concerned about them at least consider the great loss in the very expensive assets you tell me the Navy depends on to protect our country.

Please don't 'blow this off' as a disgruntled anti-Navy liberal. I am an independent voter

and thinker. The things I have written to you are true and worthy of consideration.

Sincerely,

Coupeville, WA. 98239

CC Senator Patty Murray, Senator Maria Cantwell, and Congressman Rick Larson

Dear Secretary of the Navy,

As a Coupeville resident, I would like to say that I want the Navy to stay on Whidbey! I appreciate what they do to keep us safe and what they bring to our local economy. What I don't want is the number of flights at OLF to increase according to your options. Coupeville is a very unique and special historic town and it needs to be protected. It is a very popular tourist town and a large increase in flights at OLF would ruin the tranquil feeling here. I have a B&B here in town and people often ask how often the planes fly. It would be a disaster to have them increase to 15,000 or 35,000 flights---that would be flights all day and night everyday but the weekend and that is just not acceptable. Our property values would drop and the town would eventually die with no tourists coming.

Whidbey Island is such a special place for people to come and enjoy the beauty of beaches, farmlands, wooded trails and parks and the peaceful quiet! So please don't ruin all these special things!! Other problems are water contamination, noise damage, pollution to farmlands, children learning issues, etc! etc! etc! So please do not ignore our pleas to you and really think this through to realize what impact this would have on our town. Thank you-[redacted] from the [redacted] in Coupeville.

P.S. hopefully someone reads these letters!

[redacted]

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Whidbey Island is such a special place for people to come and enjoy the beauty of beaches, farmlands, wooded trails and parks and the peaceful quiet! So please don't ruin all these special things!! Other problems are water contamination, noise damage, pollution to farmlands, children learning issues, etc! etc! etc! So please do not ignore our pleas to you and really think this through to realize what impact this would have on our town. Thank you-[redacted] from the [redacted] in Coupeville.

P.S. hopefully someone reads these letters!

[redacted]

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

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

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

1. **Name** [redacted]

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

_____

3. **Address** [redacted] Coupeville 98239

4. **Email** [redacted]

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

Comments

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)

- [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:

- [x] **The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**
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- [x] **Mishaps and crash risks due to problems such as their onboard oxygen system.**

Please include any additional comments and concerns here:

Please consider the dire economic consequencos to the second oldost town in Washington. The proposed action will destroy the Central Whidbey economy The proposed action will have significant physical impact to the structures in Ebey's Reserve

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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 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,

[redacted]

Coupeville, WA 98239
[redacted]

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Please include any additional comments and concerns here:

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

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Prepared by Coupeville Community Allies
January 18, 2017

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Please include any additional comments and concerns here:

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

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

January, 2017 Comments

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

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation Shawinc

4. City, State, ZIP Shaw Island WA 98286

5. E-mail _____

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

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

[redacted]

01/08/16 **www.QuietSkies.info**

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

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

_____

_____

_____

_____

_____

_____

_____

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- [ ] 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 concerned about the large potential increase in OLF Growler flights that will impact noise, planes near Coupeville HS + MS, water contamination of city + private wells, impacts on tourism and business + no alternate Growler fields planned for.

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Please include any additional comments and concerns here:

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

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Believe the non-auditory (ie: cardio-vascular, sleep disturbance, etc) risks have been vastly under-estimated.

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   Resident

3. **Address** [redacted] Oak Harbor 98277

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

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Norfolk, VA 23508

1. First Name [redacted]

2. Last Name [redacted]

3. Organization/Affiliation Quiet Skies

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

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January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12. Add your own comments here:

As to health affects, we have health problems that are worsened by stress heart and cancer - Our heart rates soar when touch + go (CLP) is directly over our house.

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** [redacted]

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

   CITIZEN - RESIDENT

3. **Address** [redacted] COUPEVILLE WA. 98239

4. **Email** _____

Comments

Check all that concern you. For additional information see www.facebook.com/whidbeyeis

☑ **Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations to up to 35,000 per year (135 flight operations daily) ,will dramatically increase the residential and commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**

☑ **Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. In 2016 over 10% of all private wells tested were found contaminated above the EPA standard . The extent full of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.

(over)

☑ **The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

Please include any additional comments here:

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

What else you can do

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

To Learn More

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

This ad paid for by Coupeville Community Allies

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

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

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

1. **Name** [redacted]
2. **Organization/Affiliation** (resident, citizen, business, nonprofit, veteran, retired military)
   Citizen
3. **Address** [redacted], Clinton, WA 98236
4. **Email** [redacted]

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

Comments

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

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:

As a resident of Whidbey Island I am very concerned about –
- Water Contamination to our sole-source aquifer
- Actual noise measurements were not made!
- Alternatives to using the OLF were not adequately assessed
- Impact on children – not adequately addressed
- Economic impact on tourism, property values, loss of businesses not addressed adequately
- Impact to natural resources, wildlife, impact on Ebey's Landing Reserve not adequately addressed
- Frequency + impact of fuel dumping on homes + farms not addressed

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

For more information, see, Coupeville Community Allies, www.facebook.com/whidbeyeis

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