



December 24, 2014

Naval Facilities Engineering Command Atlantic
6506 Hampton Boulevard
Norfolk, VA 23508

Attn: Code EV21/SS

We appreciate the opportunity to provide comments on the Navy's scoping process for the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island. Our comments are on behalf of the more than 900 Sierra Club members on the North Olympic Peninsula directly affected by the extremely loud noise generated by the Navy's training exercises that will be made worse by the proposed additional Growler aircraft.

Whidbey Island, where these planes are located, is a vibrant, beautiful, and historic region that has been adversely affected by the extreme aircraft noise from the Navy's training flights. Ebey's Landing National Historic Reserve, an over 17,000-acre national park of environmental, cultural, and historical significance has been particularly affected. The Reserve and adjoining wetlands are also an important wildlife and migratory bird habitat that is in the vicinity of an antiquated World War II landing strip, the OLF, that is used by the Navy for practice touch and go exercises. While section 106 of the National Historic Preservation Act requires the Navy to consider the effects of its operations on historic properties, potential adverse impacts on wildlife and migratory birds should also be considered in the EIS.

In addition to adversely affecting historic structures and wildlife, the Navy's own audit found that its jet aircraft emit noise well in excess of the normal human pain threshold. Training flights have occurred at all hours of the day and night and often continue for extended periods of time. Nearby residents experience high levels of jet noise even within their shuttered houses and visitors are unable to avail themselves of state and federal recreational lands during these times.

We urge the Navy to use the "Sound Exposure Level" metric and not the "Day-Night Average Sound Level" metric in assessing the impact of noise on both humans and wildlife. The nature of the Navy's training exercises at OLF are, by their nature, episodic and it is inappropriate to average the noise impacts over a 24-hour period. Real-time high noise events experienced with each operation should be examined rather than averages which include periods when the jets do not fly. Recent noise tests conducted by affected residents found that maximum sound levels from Growlers using the OLF were "well above the levels

requiring hearing protection and are high enough to potentially result in permanent hearing loss." The EIS should include real measuring and not computer modeling averaged over a 24-hour period.

Tourists will avoid visiting and businesses and residents will not relocate to an area that is constantly inundated with jet aircraft noise. The Navy must evaluate in the EIS the impact of jet noise on the local economies of Jefferson, Clallam, Island, and Skagit Counties. These counties, predominately rural and residential in nature, are highly dependent on recreational tourism and its associated services. In fact, fully 24% of Jefferson County's per capita income has been attributed to the proximity of protected, natural areas like the nearby Ebey's Landing and the numerous State parks on both sides of Admiralty Strait. The EIS must also examine how the additional Growlers and more frequent use of the OLF will adversely affect the local real estate market.

By the Navy's own admission in its scoping materials: "Landing on an aircraft carrier is one of the most dangerous tasks a pilot can perform." However, these training exercises, particularly those at the OLF, occur within a populated area and present unacceptable accident hazard to residents, school children, and visitors. The OLF is an antiquated World War II runway that lacks the proper clearances for safe take offs and landings and it should be closed. The EIS must look at training location alternatives to the continued use of the OLF. In 2013, the OLF was not used for nearly six months, during which time flight training had been safely continued elsewhere, proving that the Coupeville OLF is not an essential facility.

The EIS must also address the numerous peer-reviewed studies documenting the various health effects of aircraft noise, including permanent hearing damage, blood pressure and cardiac problems; children's greater susceptibility to jet noise; and harm to livestock and wildlife. Studies include those by: The World Health Organization; The U.S. Department of Transportation; and The U.S. Environmental Protection Agency. The EIS should also assess the health effects of exposure to toxic jet aircraft pollution and the environmental consequences of dumping excess fuel over our waters and land.

The Sierra Club's North Olympic Group joins with local citizens in requesting the Navy address these issues in the Environmental Impact Statement (EIS) being prepared for EA-18G Growler Airfield operations at the Naval Air Station on Whidbey Island.

Sincerely,

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