

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

Attn: Code EV21/SS

January 9, 2015

Dear Sirs,

Thank you for the opportunity to provide scoping comments on the Navy's upcoming Draft Environmental Impact Statement (DEIS) for the addition of 36 EA-18G Growler jets to the fleet of 82 existing Growlers at Naval Air Station Whidbey Island. I am a retired biologist from the US Fish and Wildlife Service and live in Port Townsend, Washington, which is 13 miles across Admiralty Inlet from Naval Air Station Whidbey Island. As I write this letter I am hearing near-constant jet noise from two days of carrier landing practice, and it is intrusive.

I remain very concerned about the way the Navy has conducted the public process, and am worried about potential impacts of jet noise, pollution and other stressors to the health and well-being of communities, businesses, wildlife and natural habitats on the Olympic Peninsula.

SEPARATION OF ISSUES INTO 5 COMMENT PERIODS IN 2014:

The National Environmental Policy Act of 1969 (NEPA) requires all federal agencies to prepare an Environmental Impact Statement whenever they undertake any significant action, and further stipulates that all activities that are functionally related must be included. NEPA does not allow functionally related issues to be parceled out into separate processes, but in conducting its NEPA process, the Navy has illegally separated the ground, air, and sea-based activities of its proposed Electronic Warfare Testing and Training program into different public processes that have resulted in five separate comment periods in 2014; four of them within the last five months of the year:

1. January – April (Closed): Draft EIS on Northwest Training and Testing Draft Environmental Impact Statement/Overseas Environmental Impact Statement.
2. August (Closed): The Navy's Pacific Northwest Electronic Warfare Range Environmental Assessment, on use of roads in the Olympic National Forest;
3. September – November (Closed): The Forest Service's decision on whether to issue a Special Use Permit for the above;
4. Closes January 9: An EIS on the Navy's addition of 36 EA-18G Growler jets to its fleet of 82 Growlers already at NASWI;
5. Closes February 2: Changes to the EIS called "Northwest Training and Testing Draft Environmental Impact Statement/Overseas Environmental Impact Statement," on expansion of sonar and explosive activities in the "training zone" that includes the Strait of Juan de Fuca, the waters off Indian Island, and the Olympic Coast National Marine Sanctuary, which consists of 2,408 square nautical miles off Olympic Peninsula coastline. .

The public does not view these electronic warfare testing and training activities as separate, and the Navy's separation of them into five distinct processes is causing widespread confusion and frustration. I understand that the current EIS component is only about the additional 36 EA-18G Growler jets, but certainly the air and ground-based activities in this training program are too closely related to be considered separately.

The scope of the EIS as described in the Fall 2014 brochure, "A Guide to the Scoping Meeting (for the subject EIS)" is far too limited to comply with the National Environmental Policy Act (NEPA). The geographic area proposed to be covered by the EIS is limited to the Whidbey Island area generally, and to landings, takeoffs, and touch and go training at Ault and OLF fields. As anyone who lives in the area near these flight paths well knows, the noise footprint of these aircraft is not limited to Whidbey Island, it is along, adjacent to, and at a large distance from, the flight paths in and out of NASWI and to and from the Olympic and Roosevelt-Okanogan MOAs. Impacts do not end at the little red flight path lines drawn on illustrations, they extend to as far as the EA-18Gs fly. Growler jets are loud, and pilots are flying them over our communities at low enough altitudes to cause disturbances.

Under NEPA those impacts must be evaluated in the EIS – both in the area between Whidbey Island and the proposed EWR, and in the area of the proposed EWR. Because that was not done in the Navy's Environmental Assessment (EA) for the proposed EWR, it should be done now. This is also necessary under the 1988 Master Agreement between the Department of Defense and the US Department of Agriculture. That Master Agreement requires the Forest Service to study both the impacts of the proposed land-based training activities and the impacts of the proposed use of airspace if "directly associated with the land based training."

So the separation of ground and air-based activities into different study processes, one an EA and one an EIS, in which the public must restrict comments to narrowly defined subject areas, goes against both NEPA and the Master Agreement. I ask you to fulfill the stipulations of the Master Agreement and the requirements of NEPA, and include a thorough study of all impacts of the Electronic Warfare Range in the DEIS.

The Navy's EA for the EWR states at Page 2-8:

"All of the EW training activities and locations that would be associated with the implementation of the Pacific Northwest EW Range were analyzed in the NWTRC EIS/OEIS. The NWTRC EIS/OEIS has an October 2010 Record of Decision that approved an alternative that included EW training activities associated with the establishment of a fixed emitter in the Pacific Beach area. Current training levels in the Olympic MOAs and W - 237 will remain the same as per the NWTRC EIS/OEIS, and any changes to the type or tempo of training conducted in the Olympic MOAs

and W - 237 will be addressed in the Northwest Training and Testing (NWTT) EIS/OEIS.”

Unfortunately, neither statement is accurate. That the NWTRC EIS does not evaluate the activities contemplated by the proposed EWR is apparent from the following tables:

Table 3.2-2 lists the emission sources for all training activities evaluated by the NWTRC EIS. The only emission sources listed for Electronic Combat are from aircraft and ships or boats. There are no emission sources listed for ground based mobile emitters. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the ground based mobile emitters should have been listed here as an emission source.

Table 3.3-8 lists, by activity and training area, the stressors and hazardous materials that would be associated with the activities evaluated by the NWTRC EIS. For Electronic Combat the only areas listed are the Darrington Area and W-237. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the Olympic MOAs should have been listed here as a training area.

Table 3.16-1 lists by Range and Training Site, the training environment and the type of training activity covered by the NWTRC EIS. For Electronic Combat the only area listed is W-327. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the Olympic MOAs would should have been listed here as a training area.

Table 3.16-2 lists by warfare type the area in which it would be conducted. For Electronic Combat the only areas listed are W-237a and the Darrington Area. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the Olympic MOAs would should have been listed here as a training area.

That the NWTT EIS did not evaluate the activities contemplated by the proposed EWR is apparent from the following statements:

At Page 2-3 it says “The land resources affected by the use of the Olympic MOAs A and B will be evaluated as they are directly impacted by overflights for at-sea activities;

At Page 3.6-18 it says “The training activities involving aircraft in the Olympic MOAs evaluated in this EIS/OEIS are similar to the training evaluated in the NWTRC EIS.” With Electronic Combat training in the Olympic MOAs not having been evaluated in the NWTRC EIS, this sentence demonstrates it was not evaluated in the NWTT either.

The Navy must evaluate the impacts of the Growlers, not just the new 36 jets but all proposed 118 of them, both in the area between Whidbey Island and the proposed EWR, and in the area of the proposed EWR, with the same intensity and specificity it evaluates the impacts of the Growlers in the Whidbey Island area. Because there are 15 mobile emitter sites in the proposed EWR and one fixed emitter site, there are essentially 16 OLFs in the proposed EWR. A detailed portrayal of flight paths for each of the 16 proposed emitter sites is needed. The same is true of every possible flight path to and from the proposed EWR. With neither the NWTRC EIS nor the NWT T EIS having evaluated Electronic Combat in the Olympic MOAs, or aircraft flights in the area between Whidbey Island and those MOAs, the impacts of the 82 or so Growlers currently at NASWI, as well as the proposed 36 new Growlers, must now be evaluated in the proposed EIS.

NO SUBSTANTIATION AS REQUIRED BY 1988 MASTER AGREEMENT:

The Navy should also consider that the 1988 Master Agreement authorized military use of National Forest lands only if that use is "...compatible with other uses and in conformity with applicable forest plans, provided the Department of Defense determines and substantiates that lands under its administration are unsuitable or unavailable." NASWI is already conducting electronic warfare training at several Department of Defense bases in the Northwest that include restricted airspace and nearly half a million acres of land. Only one, the Fallon Training Range Complex, is mentioned, in a single paragraph on page 2-9 of the EA.

This does not qualify as the kind of substantiation required by the Master Agreement. At a public meeting, John Mosher stated that scheduling problems at other bases was a compelling reason for the Navy's proposed actions, but this reason was not stated in the EA. If scheduling problems are the reason that has caused the Navy to want its own warfare range, then the Department of Defense is obligated to do a better job of scheduling its range use before allowing the Navy to proceed. The tradeoffs reported in the EA, which include \$5 million in fuel savings and more time for pilots to spend with families, is far too high in terms of unknown, unstudied and unspoken impacts to the Olympic Peninsula.

Also, Capt. Michael Nortier, the commanding officer at NASWI, stated as a Guest Columnist in the Whidbey Island News-Times on December 17, 2014 and in the Port Townsend Leader on December 24, 2014, "The armed services have decades of experience successfully operating similar fixed and mobile emitters at a variety of locations across the nation." This being the case, the Navy cannot meet the condition under the Master Agreement that lands already "under [the DOD's] administration are unsuitable or unavailable" for an electronic warfare range. As a result, use of mobile sites in the Olympic National Forest for the proposed EWR may not be legal.

THE SCOPE AND INTENT OF ELECTRONIC ATTACK TRAINING:

Section 2.1.2 of the EA that the navy issued in September 2014 says, “The activities of the Proposed Action center on two divisions of EW, known as electronic warfare support (ES) and electronic attack (EA)”;

Section 1.3 of the EA for the proposed EWR, and the related Forest Service and Navy FONSI, say “The purpose of the Proposed Action is to ... maximize the ability of local units to achieve their training requirements on local ranges”;

Section 4.2.1.3 of the EA for the proposed EWR says, “The Wing’s mission is to support U.S. Naval Air Forces and the Unified Command Structure by providing combat - ready Tactical Electronic Attack squadrons which are fully trained, properly manned, interoperable, well - maintained, and supported.” The Proposed Action section of the Fall 2014 “A Guide to the Scoping Meeting (for the subject EIS)” says “The Navy is proposing to increase electronic attack (VAQ) capabilities by adding up to 36 aircraft to support an expanded VAQ mission and training at NAS Whidbey Island.” Finally, the VAQ Mission and Training section of the above mentioned Guide says, “The missions of the VAQ squadrons include electronic surveillance and attack against enemy radar and communications systems. This involves the use of jamming equipment and anti-radiation missiles. The Growler has an advanced electronic system that allows it to identify targets and protect itself from those targets.”

The Navy cannot “maximize” the use of the proposed EWR, nor can it produce “fully trained” “combat-ready Tactical Electronic Attack squadrons” on the proposed EWR without electronic attack training being conducted there. Nor can the Navy meet the Proposed Action and VAQ Mission and Training goals for the proposed action without electronic attack training being conducted on the proposed EWR.

In the Navy’s informational meetings at Forks, Port Angeles and Pacific Beach, on the proposed EWR, as well as in the EA for the proposed EWR, it is suggested that electromagnetic radiation from the proposed emitters would not be dangerous, in part because it was directed upwards and away from any living thing that could be adversely affected by it. The implication from this is that EMF directed downwards, as it will be from Growlers training in the proposed EWR, would be dangerous. According to a navy spokesman in a news interview, part of the training requires identification by aircrews of the signal ID from the emitters, and then they must initiate a “simulated harm shoot.” What exactly is a simulated harm shoot? What type of weapons will be used for that? What are the risks involved? The Navy has chosen not to address this element of the proposed EWR in its environmental documents. NEPA, however, does not allow for that exception.

Assurances have been made by the Navy at public meetings (and recorded on videotape) that no electronic attack weapons would be used during training, but such statements are contradicted by the citations listed above, from the Navy’s own documents. **If true, those assurances must be clearly incorporated, in writing,**

in the EIS. The Navy must fully study the impacts and risks to public health and the environment of this electronic attack training in the proposed EIS. All true intentions regarding electronic attack training must be disclosed in the EIS, and an analysis of economic impacts on affected communities, many of whose economies run on tourism, must be provided.

NOISE HAS SPREAD AND INCREASED DRAMATICALLY:

Over the past several years there has been a marked increase in jet noise around the Olympic Peninsula. Flights at OLF-Coupeville increased from 3,200 in 2010 to 13,300 in 2012. The number of flights is likely to increase given the relocation of the nation's entire Growler fleet to NASWI, and the fact that the Navy has embarked on a contract to train foreign pilots at NASWI. Although the Navy is authorized to fly at 6000 feet above mean sea level, its pilots are allowed to fly as low as 1200 feet above ground level over some parts of the Olympic Military Operating Area (MOA,) which occupies the airspace over the Olympic National Forest and Olympic National Park. Additionally, Growlers taking off and landing at NASWI are more likely to fly at lower altitudes over Port Townsend and nearby communities, thus creating more noise. The Navy has been asked at public meetings to fly over water rather than directly over these communities, but has answered that its hands are tied because flight paths are controlled by the FAA. If the Navy is working with the FCC on de-conflicting interference with civilian frequencies, then why can it not work with the FAA to defuse a noise issue that has so angered the public?

The Navy uses the "Day-Night Average Sound Level" calculation to assess noise levels, but uses a jet engine placed on a test platform and a computer modeled calculation rather than an actual jet. Using a similar method to what the FAA uses at commercial airports, the Navy averages the noise levels over 365 days that include quiet periods in order to calculate noise levels. Growlers can produce enough noise to cause hearing loss. They are capable of speeds of 1400 mph, and unlike the subsonic Prowlers they are replacing, which can fly at 600 mph, Growlers are capable of producing sonic booms, which have been described at public meetings by residents of communities on the West End. Navy statistics for older jets say they can produce 113 decibels at an altitude of 1000 feet, which is above the human pain threshold. No accurate sound measurements for Growlers have been provided by the Navy to other agencies or to the public.

Since the fuselage, external instruments and weapons attachments on a jet create additional noise to that of the engine, especially at takeoff and landing, and since afterburners are frequently used but have not been included in any noise level calculations, this must be rectified with more accurate noise measurements that use a more realistic means of feedback. Computer modeling that averages noise over a year of quiet periods reflects neither the aforementioned aspects nor the episodically extreme nature of Growler jet noise. Federal and state agencies rely on the Navy's noise data to assess potential impacts to threatened and endangered species. If such measurements do not reflect the realities of Growler jet noise, documentation of their application in assessing impacts may be invalid.

I am encouraged by the statement in the above mentioned Guide that says: "A noise assessment will be conducted as part of the EIS and it will include a supplemental noise analysis, a potential hearing-loss analysis, and an assessment of non-auditory health effects. The supplemental noise analysis will include an evaluation of sleep disturbance, indoor speech interference, and classroom learning interference. The potential hearing loss analysis will focus on any portion of the local population that may be exposed to noise levels greater than 80 DNL. Finally, the assessment of non-auditory health effects will consist of a comprehensive literature review."

These studies, however, must be done with real noise level data obtained from actual on-ground measurements under the actual, specifically located flight paths that the Growlers will travel, wherever they travel, and at whatever power levels they travel, including all times when their afterburners are operating. These studies must also be done by time of day and by time of year, and must be corroborated independently. Seasonal considerations are particularly important in relation to nesting seasons for endangered birds, as well as tourist seasons for Olympic National Park and surrounding areas. It is not sufficient to assume that training will take place at a constant number and duration of flights throughout the year, unless in fact it does.

These studies should include C-Weighted sound measurements and analysis, they must incorporate supplemental noise measurements including Sound Exposure Level (SEL) and Peak Sound Level (Lmax), in addition to Ldn, and they must document the projected annual number of events that exceed 60 dB SEL and Lmax in 5 dB increments throughout the impacted areas. These studies should also address the health effects of "Startle Reactions" and the effects on a person's feelings of loss of control over their environment when subjected to noise impacts beyond their control.

There are numerous peer-reviewed scientific studies, including reports by the Environmental Protection Agency, the World Health Organization, and the US Department of Transportation, on the health effects of aircraft noise and pollution. The EIS must address these issues using a thorough analysis of existing scientific literature.

OTHER IMPACTS MUST NOT BE EXCLUDED:

The mention of certain impacts herein does not mean to imply that there are not other impacts to cover. The proposed EIS must consider the full range of environmental issues and not eliminate any issues on the basis of preliminary, incomplete studies that purport to reveal resources upon which the proposed action is unlikely to have any potential environmental impacts. For example, the single study on effects of electromagnetic radiation on biological tissue stands alone in a field of more than 1,000 peer-reviewed studies that refute it. The Navy appeared to be cherry-picking its references. As another example, fire danger is not mentioned

in any documents, yet EA-18Gs have a crash rate many times higher than other jets and carry thousands of gallons of fuel. Fuel dumping continues to occur, and eyewitness accounts have reported it. Does the Navy keep records on the number of times this occurs, and does it have estimates of the amount of fuel dumped? Have scientific investigations been conducted on the effects of this dumped fuel on surrounding lands and waters? The DEIS should also address this concern in a thorough manner. No studies on the effects of toxic substances on the area west of the runway in which fuel is “normally” dumped have been provided. In the September 2014 EA, the exclusion by dismissal, of geology, water, land use, cultural, transportation resources, and socioeconomics, and environmental justice and, especially, protection of children was simply inexcusable.

There has been no discussion or documentation from the Navy on impacts to property values or tourism-based economies from jet noise, and we ask that these analyses be included in the DEIS. We are aware of the devastating impact on from jet noise on the real estate market at North Whidbey Island, and have similar concerns for Port Townsend. These concerns also include economic impacts to our tourism-based economy.

In 2010 there were 335 openings at the Hood Canal Bridge, most of which took 30 minutes and resulted in extensive traffic backups. 100 of these were for the Navy. According to the Supplemental EIS, there may be more bridge openings associated with the Navy and they will be longer because of the number of escort vessels and slow speeds required; 60 of these openings will last up to 60 minutes, with Washington State Patrol Troopers and canine teams erecting physical barriers at each end of the bridge. On page 3.32 of the Supplemental EIS it says that advance notice for these openings is “limited for national security reasons and transits could occur any time of day and any day of the week.” Therefore, “vehicles and vessels may be less able to choose to avoid the area during these events.” Some medical services such as kidney dialysis, that are not available in Port Townsend or other communities west of the Hood Canal Bridge, require patients to cross the bridge. Delays caused by increased numbers of 60-minute openings with less advance notice and the ensuing massive backups they cause will mean missed appointments, or missed flights at SeaTac, or re-routing of ambulances. We ask that the Navy make every effort to give the public enough advance notification of bridge closings so that critical services are not interrupted and so that risk to medical patients is minimized.

The Pacific Northwest Electronic Warfare Range covers more than just the Olympic National Park and Olympic National Forest; it also includes DNR, Tribal and private lands in western Clallam, Jefferson and Grays Harbor Counties, as well as offlying waters that include the Olympic National Marine Sanctuary plus the Strait of Juan deFuca and Puget Sound. Anything less than a full analysis of all impacts from the Navy’s Electronic Warfare Testing and Training program in all of these areas would be less than adequate.

In evaluating the impacts on Olympic National Park, the Navy should pay special attention to the fact that the Park is a World Heritage site, an International Biosphere Reserve, and the home of One Square Inch of Silence, one of the quietest places in the United States. The Park includes the world's last remaining coastal rainforest ecosystem of its kind. It is an irreplaceable cultural and natural resource. It is also the economic hub of the Olympic Peninsula. No proposed action by the Navy should adversely impact this treasure in any way.

THREATENED AND ENDANGERED SPECIES:

With regard to endangered species, there are many problems with using a Biological Opinion that relies on data at least 5 years old to justify the Navy's claim of "no significant impacts" to wildlife and habitats. A Biological Opinion is for the purpose of evaluating whether an activity will jeopardize the continued existence of a listed species. It does not address anything else – only effects on species that are already threatened with extinction.

The Fish and Wildlife Service's 200-page 2010 Biological Opinion covered a huge area of airspace, but only 875 acres of land were specifically named, between Everett and Mt Baker. The lone ground-based emitter mentioned was located in Coupeville, and the number of annual training events for Growler jets proposed back in 2009 was 275. That's all the Biological Opinion evaluated. Not 3 mobile emitters and one fixed tower in 15 new places, nor 36 (or 118) Growler jets in areas previously not evaluated, nor 2,900 training events in the Olympic National Forest and another 2100 in the Roosevelt-Okanogan MOA, for 8 to 16 hours per day, 260 days per year. This is twenty times the level of activity that was covered in the Biological Opinion. The Navy is now moving into an area for which no adequate biological analyses have been done. Therefore, using the 2010 Biological Opinion to justify the Navy's claim of "no significant impacts" invalidates such claims as well as the Environmental Assessment itself. Plus, use of computer-modeled noise levels of older jets that are far less loud as Growlers invalidates the Biological Opinion for the proposed activity with Growlers.

In 2010, the Fish and Wildlife Service concurred with the Navy's assessment of most of the endangered species except for the marbled murrelet and the bull trout. In both cases, they said these species would likely be adversely affected, but the Navy's actions were not likely to "jeopardize" the species, meaning render them extinct, because they are still found in other areas. The only mention of the airspace in the Olympic Military Operating Area was to say that the jets flying enroute to training activities at sea would be at such high altitudes that no effects were anticipated for the threatened and endangered species in that area. Things have changed dramatically in five years. Now the Navy is moving its activities into those other areas, yet insists on relying on a Biological Opinion that did not adequately evaluate effects on the Olympic Peninsula.

Marbled murrelet abundance decreased 26 percent between 2002 and 2010, and the top conservation priority to keep them from going extinct remains reproductive

success. A big stronghold for these birds is the area that the Navy is expanding into; combined with the Navy's impacts from sonar and explosives, the possibility of jeopardy can no longer be ignored.

When asked at a public meeting, both the Navy and the Forest Service confirmed that they had no intention of re-initiating formal consultation with the Fish and Wildlife Service or National Marine Fisheries Service. The Navy claimed that it had done informal consultation with the Fish and Wildlife Service, but has not provided the documents despite requests. The Navy must reinitiate formal consultation with the US Fish and Wildlife Service, to study impacts of jet noise and pollution on species in the area over which these jets will actually be flying. This includes the entire flight path, not just the Whidbey Island area.

NEPA DEMANDS A GOOD FAITH PUBLIC PROCESS:

Any public process must be a good faith effort. I am aware of a number of letters from the Boards of Supervisors in Humboldt, Marin and Mendocino Counties in California, expressing deep concerns about being kept unaware of the Navy's training plans along those coasts until late into the process, and later, questioning why their concerns were never addressed in the Navy's final NEPA documents. The public is worried about similar results happening here. No notices about the Navy's comment period for its Environmental Assessment (EA) were published in any newspapers that directly serve communities on the North Olympic Peninsula or West End. The only notice was an 8X11" poster pasted in the window of the Forks post office and noticed more than a month after the comment period closed.

None of the hundreds of citizen comments that were given at public informational meetings (which occurred only because of the insistence of Congressman Derek Kilmer) were ever recorded for the official record. In its public outreach materials for the Olympic Peninsula, the Navy shows the locations of its 15 proposed emitters using a map that erases Lake Quinault, all major rivers, and all boundaries between the Olympic National Forest and Olympic National Park. If helping the public understand exactly where the emitters are to be located was the purpose of the map, then why was so much important detail omitted? The Navy must stop omitting important information that makes it more difficult for the public to understand their intentions.

I have seen letters from County Commissioners in Humboldt, Marin and Mendocino Counties in California, that first express concern at having been unaware of the Navy's plans for their coastal waters and later, dismay at having seen their concerns ignored in final documents. Therefore, I question the transparency of the Navy's public process, and in particular, how it justifies the fact that after a comment period on its EA that was half the 30-day minimum length recommended by NEPA, it issued immediately after and continues to stand by, a Finding of No Significant Impact (FONSI) that includes this statement: "The Navy received no comments from individuals, elected officials, government organizations, or Native American Tribes in response to the Draft EA." Once the public became aware of the Navy's plans,

more than 3,000 comments poured in during the October-November comment period on whether the Forest Service should issue a Special Use Permit for use of its roads, thus refuting any previous implications that public concern is lacking.

With these problems in mind, the FONSI of August 28, 2014 must be cancelled, the September 2014 EA nullified, and an EIS process initiated to combine all of the proposed activities, addressing concerns that have been raised again and again, about potential impacts to the health, economic and ecological values of all communities and public lands that will be affected.

Please send me by email, a link to an online copy of this EIS when it is ready for distribution.

Thank you for the opportunity to comment.
Sincerely,
Karen Sullivan