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EA-18G EIS Project Manager
Naval Facilities Engineering Command (NAVFAC) Atlantic
6506 Hampton Boulevard
Norfolk, VA 23508

Attn: Code EV21/SS

Dear Sir or Madam,

We appreciate the opportunity to provide 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 (NASWI.) The Port Townsend City Council supports the need for the Navy to properly train and maintain a high state of proficiency and readiness to safeguard our nation and the men and women who serve in the Armed Forces.

We are seven members of the City Council of Port Townsend, Washington, representing a city of approximately 9,200 residents in Jefferson County, Washington, located across Admiralty Inlet from Naval Air Station Whidbey Island. As the legislative and policy-making body in city government, we conduct our business in full view of the public, and as the elected representatives of this community we provide the following comments (requested action items are shown in **Boldface**):

- We do not believe that the way the Navy has conducted the public process for this EIS, and how it relates to past iterations of this "ongoing" EIS and the Environmental Assessment that evaluates proposed Navy operations in the Military Operations Area in the Olympic National Forest complies with NEPA's requirement that the effects of functionally-related activities must be assessed together.
- We do not believe that the DEIS properly reflects the impacts of jet noise, pollution and other stressors to the health and well-being of our community and our neighbors on the Olympic Peninsula.
- We are concerned that some verbal assurances by Navy personnel in public meetings are not clearly reflected in the written materials.

We ask that all of these concerns be addressed in the DEIS.

With respect to the Public Process

Our first concern is that the Navy has separated the ground, air, and sea-based activities of its proposed Electronic Warfare Testing and Training program on and around the Olympic Peninsula into different public processes that have resulted in four separate comment periods in the last five months of 2014:

1. August (Closed): The Navy's Pacific Northwest Electronic Warfare Range Environmental Assessment, on use of roads in the Olympic National Forest;
2. September – November (Closed): The Forest Service's decision on whether to issue a Special Use Permit for the above;
3. 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;
4. 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.

Our constituents have told us that that they do not view these electronic warfare testing and training activities as separate, and the Navy's separation of them into four distinct processes are causing widespread confusion and frustration. We realize that the current EIS component is only about the additional 36 EA-18G Growler jets, but the air and ground-based activities in this training program are far too closely related to be considered separately. 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.

A 1988 Master Agreement between the Department of Defense and the US Department of Agriculture 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. We 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.

Another part of the 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. 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.

We are in possession of letters from the Boards of Supervisors in Humboldt, Marin and Mendocino Counties in California, that express deep concerns about being 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. We are worried about similar results happening here.

Any public process must be a good faith effort. 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. 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 15 locations proposed for the use of the 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?

We 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, we would like to see the FONSI revisited and an EIS process initiated to combine all of the functionally-related proposed activities, and to address concerns that have been raised about potential impacts to the health, economic and ecological values of all communities and public lands that will be affected.**

Local Noise Impact

Our second major concern is with noise. 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, thus creating more noise.

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, we ask that this 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.

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.

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 DEIS must address these issues using a thorough analysis of existing scientific literature.

Clarify Training Operations

The EA is inconsistent in providing assurance that electronic attack weapons will not be used as part of the training exercises. The Olympic Peninsula is no longer lightly

populated as it once was when the Military Operating Areas were established, and places like Olympic National Park receive more than 3 million visitors per year who spend hundreds of millions of dollars in surrounding communities. If visitors become concerned that they may be entering a warfare training range where weapons such as lasers or high-powered microwaves or EMPs are being used overhead, tourism and the revenues from it could drop off drastically. At several public meetings the Navy has stated that no electronic attack weapons will be fired, yet in Section 4.2.1.3 of the EA it says the mission is to provide "combat-ready Tactical Electronic Attack squadrons which are fully trained." **We ask that the DEIS incorporate written assurances that no electronic attack weapons will be fired during training missions in or near Olympic National Park, in conformance with the verbal statements provided at the public meetings.**

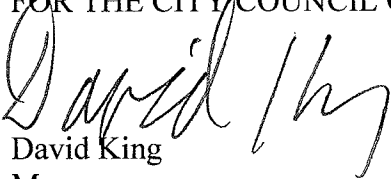
Summary

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 off-lying waters that include the Olympic National Marine Sanctuary plus the Strait of Juan de Fuca 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.

We do not write this letter in isolation from our constituents. **On behalf of the City of Port Townsend, we ask that ALL impacts of the Navy's Electronic Warfare Testing and Training program be discussed in one comprehensive document, and that the stipulations of the 1988 Master Agreement be followed.**

Thank you for the opportunity to submit these comments.

FOR THE CITY COUNCIL OF PORT TOWNSEND, WASHINGTON



David King
Mayor

cc: Admiral Jonathan Greenert, Chief of Naval Operations
Honorable Ray Mabus, Secretary of the Navy
Honorable Tom Vilsack, Secretary of Agriculture
Honorable Patty Murray, U.S. Senator
Honorable Maria Cantwell, U.S. Senator
Honorable Derek Kilmer, U.S. Representative
Honorable James Hargrove, Washington State Senator
Honorable Steve Tharinger, Washington State Representative
Honorable Kevin Van De Wege, Washington State Representative