



February 18, 2017

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

Re: Draft EIS for EA-18G Growler airfield operations at Naval Air Station (NAS) Whidbey Island

On behalf of the Sierra Club's North Olympic Group and its 1,000 members, we are commenting on this draft EIS that would expand existing EA-18G Growler operations at the NAS Whidbey Island by adding 35 or 36 aircraft to support expanded electronic warfare exercises on OLF on Whidbey Island and in the San Juans, Puget Sound, Olympic Peninsula, and adjacent areas. While we support the need for adequate military training, we also support a fair and open public process that protects public health and the environment.¹ Unfortunately, the Navy's draft EIS fails to do so as described below:

The Draft EIS Improperly Segments the Navy's Expansion of Growler Activities

The Draft Environmental Impact Statement (EIS) is deficient in not addressing 40 additional Growlers that are in the process of delivery beyond the 35 or 36 identified in the Proposed Action.

The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into multiple 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);

¹ Sierra Club policies require that all public agencies, including the Armed Services and the Department of Defense, "should strive to protect the integrity of human and natural communities (and that) military training and preparedness should be pursued in ways that avoid or minimize adverse effects."

7. And, a seventh likely process, as confirmed by a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160.

As a result, 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 to protect human health and the environment. Furthermore, this piecemeal approach to public involvement violates NEPA as 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.”*

In public meetings, the Navy referred to these increases in Growler activities as “adjustments” to its mission, but “adjustments” to functionally and geographically related activities, each of which when taken individually might not rise to the level of “significance,” are significant when taken together. This segmentation represents a significant but hidden erosion of environmental protection and public health. Citizens, elected officials, and tribes have reminded the Navy for years that its segmentation of impacts violates both the law and the public trust, but the Navy continues to ignore these concerns.

The Draft EIS Fails to Consider All Impacts

The draft EIS only analyzes potential impacts for 35 or 36 of potentially 160 Growlers, and is further confined to evaluating impacts only to areas immediately surrounding the runways. However, jet noise, emissions and other impacts from Growler operations adversely affect a wide area including Olympic National Park, state parks, tribal and private lands as well as Puget Sound and endangered Orcas and other species.

By failing to enlarge the scope of its analysis beyond Naval Air Station Whidbey Island, the DEIS also violates NEPA by not considering all the interdependent parts of a larger action: Growler operations cannot proceed without takeoffs and landings, regional overflights, broadly distributed noise impacts, etc. By failing to consider these additional impacts, the DEIS also fails to evaluate cumulative effects as required by NEPA.

The Draft EIS Fails to Consider All Alternatives

The Navy has not made a good faith effort to explore other alternatives as NEPA requires in 40 CFR 1502.14 (a). All of the Navy’s ‘alternative’ scenarios will increase noise, harm to health, and other adverse impacts. The Navy’s “no action alternative” would continue Growler operations that currently 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. No genuine “no-action” alternative is proposed that would address these impacts. Furthermore, the draft EIS violates basic NEPA procedures as it appears to improperly reflect procurement and operational decisions already made by the Navy.

Increased Air Emissions and Worsening Effects on Climate Change Not Adequately Addressed

Growler jets use an extraordinary amount of fuel--a single Growler jet's emissions dwarf what thousands of citizens seek to reduce voluntarily by choosing to use electric cars, add solar collectors to their homes, and conserve energy in other ways. In its continuing and planned expansion of the Growler fleet, the Navy has ignored the cumulative impact of Growler emissions, including their effects on climate change. The military is the world's largest single user of fossil fuels, and exhaust emissions beyond the narrowly defined affected areas near runways are not being analyzed and should be.

The Navy Has Failed to Document that DOD-Owned Lands Are Unsuitable or Unavailable for Growler Operations

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to examine non-Whidbey Island sites to conduct flight carrier land practice (FCLP). Instead, it continues to assume that an outdated and dangerously small World War II landing strip on Whidbey, the OLFC, can be used for an increasing number of Growler and other training flights.²

The two most dangerous aspects of flying are the approach, landing and takeoff. Because the OLFC is about 49,000 acres smaller and 3,000 feet short of the Growler standard for these maneuvers, it places nearby schools, hospitals, residences, a state ferry terminal and parks, and a state conference center at serious risk of accidents. This risk is greatly increased because FLCP maneuvers are, by their nature, conducted at low elevations where collision with birds is likely to occur, particularly since much of the surrounding area is a protected habitat for shore birds.

The draft EIS, itself, acknowledges that one of the runways at OLFC has an "unacceptably steep angle of bank" and can only be used 30 percent of the time due to weather conditions. Yet knowing this, the Navy is significantly increasing the number of flights there and placing nearby communities at harm.

Impact on Threaten Endangered Species Not Adequately Addressed

The Navy needs to provide a more detailed and specific response on whether and how the additional Growlers will affect endangered species, particularly Marbled Murrelets, given that the acknowledged lack of scientific information on noise impacts to this species affects the ability to determine harm and cumulative effects. This is particularly urgent in light of their precipitous decline and the December 2016 decision by the State of Washington to reclassify Marbled Murrelets from threatened to endangered.

² Unfortunately, this failure represents a continuing pattern and is consistent with the Navy's previous decisions regarding its request for a permit from the USFS to conduct electronic warfare missions on the Olympic Peninsula. In this instance, the Navy never adequately substantiated its need for non-Defense Department lands or that DOD lands were either unavailable or unsuitable, which was the primary requirement of a 1988 DOD-USDA Master Agreement.

More generally, by failing to initiate consultation under Section 7 of the Endangered Species Act with the US Fish and Wildlife Service on the potential impacts from the significant increase in Growler flights, the DEIS fails to evaluate direct, indirect and cumulative impacts on threatened and endangered species.

Inadequate Consideration of Public Health Impacts

Growler jets utilize the latest electronic warfare capabilities yet the risk of exposure to people and wildlife from downward-directed radiation is not considered. The only discussion we are aware of was a brief mention in a 2014 EA, in reference to radio transmitters on mobile emitter trucks and the stationary transmitter at Pacific Beach on the Olympic Peninsula. In that document, the Navy referenced a paper 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. Despite this, any mention or discussion of risks from exposure to electromagnetic radiation from Navy jets is completely missing from all discussions of potential impacts.

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading for two reasons: (1) the Navy inappropriately uses a 365-day averaging rather than busy-day averaging, and (2) the Navy represents as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. Furthermore, modeled noise levels by the Navy have not been validated with on-site noise data nor has the Navy made any actual noise measurements in the affected communities. In addition, the NOISEMAP software used for computer modeling is outdated, and a report from a DOD commission concluded that noise measurements using this software may be legally indefensible.³ Additionally, the DEIS selectively 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.

Moreover, there are no alternatives proposed in this DEIS that would reduce noise. Therefore, it represents decisions already made. 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."

Also, as mentioned earlier in this letter, by narrowly considering only takeoff and landing noise and exhaust emissions at the runways themselves, the DEIS violates the National Environmental Policy Act (NEPA) §1508.25 by failing to consider the wider area of functionally connected impacts caused by naval flight operations.

The DEIS Fails to Consider Historic and Economic Impacts

The Navy has not responded to an August 2016 request for formal consultation under Section 106 of the National Historic Preservation Act, from the City of Port Townsend, in a

³ <https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>

letter also asking the Navy to expand its Area of Potential Effect (APE). The APE is so narrowly defined in this DEIS that the State Historic Preservation Officer (SHPO) wrote to the Navy in January 2017, confirming that not only would cultural and historic resources within the existing APE be adversely affected, but also recommended expanding the APE to include additional portions of Whidbey Island, Camano Island, Port Townsend, and the San Juan Islands, because the state is "...not convinced that the 65 dBA serves as the best or most appropriate measure for quantifying and assessing harmful levels of sound and vibrations from Growler activities."⁴ The SHPO went on to say, "Our concern is based upon what appears to be an averaging of sound levels over long time periods that does not adequately capture the real time experience of brief but more numerous exposures to higher decibel levels, as well as the cumulative effect of these events."

Additionally, the addition of Growlers will have a deleterious effect on the economy of the region. The region is heavily dependent on recreation and tourism and Washington's overall economy is heavily dependent on tourism and outdoor recreation, accounting for: \$22.5 billion annually, 227,000 direct jobs, and \$1.6 billion in tax revenues.⁵ Accordingly, any expansion of the Growler fleet needs to address potential job loss, economic harm, and state revenue loss from decreased tourism and outdoor recreation.

Conclusion

For all of the deficiencies, omissions, and failures to properly implement NEPA, as cited above, we are asking the Navy to issue a revised, second draft EIS with a new public comment period. We appreciate the opportunity to comment on this draft EIS.

Sincerely,

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⁴ State Historic Preservation Officer. Letter to Navy, January 9, 2017.

⁵ Outdoor Industry Association