

**Talking points and potential questions
for people to ask Navy officials at public “open houses” in early December,
on the new Growler Draft EIS.**

Find the Growler EIS here: <http://www.whidbeyeis.com>

Since these are meant to be verbal exchanges at the “open houses” held by the Navy this week in 5 communities, use of the pronoun “you” is encouraged. If Navy representative John Mosher is present, he is the official in charge of the team that produced this EIS, and should be able to answer these questions.

1.) According to the Growler EIS, total airfield operations will increase by 47 percent, to 130,000, which you say represents a return to “previous flight operations levels.” However, there has never been a jet as loud or fuel-hungry as a Growler. We know it’s far louder than the 65 decibels you use for estimating exposure in communities, which you get by averaging jet engine noise with no afterburners, with long quiet periods over a year. 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. **In the case of wildlife leaving a traditional and cultural area due to disturbance, how will you mitigate it? Will you do a better job of consulting with municipalities and Tribes on cultural and historic properties throughout the affected region than you did on the Northwest Training and Testing EIS, and will you look for solutions to noise damage to buildings and sacred places?**

2.) The computer modeling program you use to calculate aircraft noise levels (NOISEMAP Version 7.2), which has been in use for at least 12 years, was found by the Department of Defense’s Strategic Environmental Research and Development Program (SERDP) to be outdated and might not be able to “provide legally defensible aircraft noise assessments of current and future aircraft operations.”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 in standards for commercial aircraft, and that there are no standards for acquiring near-field aircraft noise data. In other words, 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. Knowing in advance that you would be increasing Growler flights at these rates, **why did the Navy rely on outdated computer modeling to establish noise**

levels, and why did you not conduct actual noise measurements in communities as requested? How do you plan to rectify this?

3.) Why did you not grant a request from Canadians to meet with them in Victoria, on this huge increase in noise? They are upset about existing levels, and it would be a courtesy to listen to their concerns.

4.) Why does the geographic scope of noise evaluation for this EIS as described on page 5-12 of the EIS limit itself to the immediate environs of the Naval Air Station Whidbey Island complex? Growler noise is chronic and loud in many communities and wildlands in other areas that your 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. People on the West End have recorded this noise, and it can be as loud as it is near the base. **Why did you limit the scope of this EIS to exclude those areas from noise evaluation?**

5.) You admit that your actions will result in larger noise contours and more noise exposure for people and animals, with the possible establishment of new noise exposure zones. Your discussion on noise exposure to children mentions up to 45 disruptions from jet noise per hour in some classrooms, and nearly 3,500 more children than before, exposed to unhealthy noise levels. **How do you justify this much increase in noise exposure to children?**

6.) Regarding the possible establishment of new noise exposure zones, your "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 you, could become "incompatible," whether they desire this or not. **What are the Navy's implications for that?** This amounts to a retrofit of your guidelines on private property owners, which could severely impact property values. People who have lived, worked and sought recreation in these areas were there long before the Growlers arrived, and they once considered the Navy a good neighbor. **How do you justify retrofitting land-use classifications on pre-existing private property, as a result of Navy expansion, and how will the Navy compensate these people for loss of property values, loss of livelihoods, and loss of traditional recreational opportunities?**

7.) The OLF airfield was built for World War II planes and does not meet Navy requirements for use with modern jets, even though you have a waiver. On page 4-9 of the EIS you admit that one of the two runways at OLF has an "unacceptably steep angle of bank" and can only be used only 30 percent of the time due to weather conditions. Yet knowing this, you are significantly increasing the number of flights there. **How does the Navy justify the additional crash risks to the community?**

8.) The OLF airfield already has dangerous crash zones overlapping with homes and businesses. Despite this, it is projected for even heavier use in the near future as

Fleet Carrier Landing Practice flights increase from 6,250 per year to 35,100, almost a 600 percent increase. Crash zones are likely to encompass more homes and businesses. The Navy says it has not yet made a decision with regard to designating more areas as "Accident Potential Zones." **When will you make this decision, and how will the Navy address the loss of property values and elevated risks of civilian injury or death?**

9.) None of the 3 alternatives in the EIS is really a "no-action" alternative, because the Navy interprets "no action" to mean continuing its existing baseline activity, when in reality the law was meant to be interpreted as "no action means no action." 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 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 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. **Why is there no genuine no-action alternative?**

10.) There have been more than 5,000 complaints about jet noise in the San Juan Islands alone. Noise and pollution mitigation technology such as aircraft Noise Attenuating Devices (NAD) could reduce pollution emissions from both particulates and NOx as well as reduce jet engine noise by more than 20 dB. NAD fabrication also costs only 6% of a typical "hush house" installation, making it very cost-effective. **So why are all Growlers not fitted with them? And how will you mitigate for noise in the expanded noise exposure footprint, especially to schools where you have identified as many as 45 interruptions per hour by jet noise?**

11.) This question is relevant because of the electronic warfare components of your expansion. The Navy never adequately substantiated 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. **So how does the Navy justify all these training flights doing electronic warfare on non-DoD public lands for which it never properly justified to the public its reasons for using?**

12.) On page 5-19 of the EIS, electronic warfare is listed as a "relevant activity," and in the Abstract it states the proposed action would:

"...increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment."

So, with electronic attack being relevant to the EIS, it might be assumed that a discussion on impacts from training with this suite of electronic attack weapons would be included. The stated intent of the 2014 Electronic Warfare EA was to "turn out fully trained, combat-ready electronic attack crews." However, it focused on the ground-based emitters and glossed over the airborne components of the training. **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 aboard these jets, 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. **Why is any mention or discussion of risks from exposure to electromagnetic radiation from Navy jets completely missing from all discussions of potential impacts?**

13.) A cost-benefit analysis was not performed as required by 40 CFR 1502.23. Of the many significant impacts stated in the EIS (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 EIS lists total employee earnings, however, but has no discussion of the costs to the public (schools, sewage, roads, other infrastructure) as a reasonable cost/benefit analysis would normally have.

Why was a comprehensive cost-benefit analysis not done?