

EIS Scoping Comment Submitted – Navy Growler, Whidbey Island, Washington

by Carol Miller on January 8, 2015, Peaceful Skies Coalition

January 8, 2015

VIA <http://www.whidbeyeis.com/Comment.aspx>

Re: Scoping comment

EA-18G Growler EIS Project Manager

Naval Facilities Engineering Command Atlantic

Peaceful Skies Coalition (PSC) is submitting comments on the Environmental Impact Statement for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island, Washington, referred to in these comments as Growler operations.

The comments are in response to the notification published in the Federal Register stating “the scoping process will be used to identify community concerns and local issues to be addressed in the EIS. Federal agencies, state agencies, local agencies, Native American Indian Tribes and Nations, the public, and interested persons are encouraged to provide comments to the DoN to identify specific issues or topics of environmental concern that the commenter believes the DoN should consider.” [Federal Register/ Vol. 78, No. 172 / Thursday, September 5, 2013 / Notices - 54635]

NEPA Violation – Isolating a Proposed Project

PSC has identified a large number, but not all, military expansions of land, water and airspace underway right now across the United States. Although there is considerable overlap and adjacencies among the projects, each DOD NEPA document we have read pretends to be limited to a very local area, a tiny piece of the big map. These actions constitute a clear violation of NEPA.

The regulations are very clear that the government cannot isolate a proposed project, viewing it in a vacuum. (40 C.F.R. § 1508.25(a)) The federal courts have consistently upheld this requirement.

The Navy has not made the slightest effort to uphold this regulation. It is conducting scoping for the Growler EIS and at the same time as other proposals. Increased Growler operations will greatly increase debilitating noise and air pollution on Whidbey Island and the public needs full disclosure of all current and near-future plans for the region.

The website of the Commander, Navy Installations Command (CNIC), lists four current NEPA proposals “in the Navy Region Northwest area of responsibility.”

Electronic Warfare Range EA

EA-18G Growler EIS

Northwest Training and Testing – Supplement to the Draft EIS/OEIS

Additional Related Information:

In order for the public to provide informed comment on the expansion of Growler operations, the public needs to be provided all information about adjacent and other proposed federal projects; whether those on public lands, private lands, or military land and airspace. A bioregional approach is essential to an accurate impacts analysis. The lands within the boundary area comprise only a part of the larger bioregion. Avian flyways, watersheds, wildlife migratory pathways, air and water quality and other natural systems extend well beyond the boundaries of the proposed Growler operations. In the development of the EIS, cumulative impacts must include all activities in the area, not only those in a narrow geographical location. As stated above, the study should consider entire bioregions, not just the area within the proposed Growler operations area.

As the NEPA analysis is prepared, establishing the proper geographic scope or boundary for a cumulative impacts analysis is extremely important because the proposed action will have direct, indirect, and “additive” effects on resources far beyond the immediate area. By way of example, for resident or migratory wildlife, the appropriate geographic area for the cumulative impacts analysis will be the species habitat or breeding grounds, migration route, wintering areas, or total range of affected population units. Consideration of other state, private, and other federal actions as well as natural occurrences or events that have taken place, are taking place, or proposed to take place that will similarly impact the region’s wildlife populations and habitat, and human communities.

Community Involvement

DOD has an apparently infinite budget for keeping communities very busy with endless NEPA requests. From the perspective of the PSC, most of the public outreach, education, and involvement is provided by community volunteers while private contractors crank out low quality NEPA documents. Right now DOD and its many contractors are simultaneously conducting Scoping, Public Hearings, Draft and Final EAs and Draft and Final EISs, and RODs. Additionally, considerable amounts of encroachment planning and massive Joint Land Use Study are underway across the country.

We hope you find these comments to be helpful, informative, and useful in your efforts to bring this proposal into compliance with the NEPA and other substantive statutes. Peaceful Skies Coalition requests that Carol Miller, an officer of the coalition, be placed on the recipient list for notices of any developments in the EA-18G Growler Airfield Operations proposal as it moves forward.

If you have any questions or comments, or wish to discuss the issues raised in this comment please do not hesitate to contact the Peaceful Skies Coalition representative.

Sincerely,

Carol Miller