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**Quietskies**

**Over San Juan County**

**Update: January 20, 2017**

As we move into the new year - the message that we all SPEAK UP for the values we care about is everywhere.

\* \* \* If you DO want to restore peace and quiet to this lovely place we call home, it's time to SPEAK UP.

\* \* \* If you DO NOT want 47% more jet traffic and a lot more Growler noise - it's time to ACT . . . NOW!

\* \* \* It's time to send in comments of the Draft Environmental Impact Statement. And, it's easy to do.

easy ways to SUBMIT COMMENTS:

**1. ONLINE:**1. Use the Navy Comment Form:   <http://whidbeyeis.com/Comment.aspx>

2. Fill out the form: Name, address etc.

3. Copy and Paste all of the comments into the Comment Form.

4. You can submit your own comments by typing directly into the Comment Form.

5. Press SUBMIT.

**2. U.S MAIL:**For a ​prepared comment document that you can print, sign and mail to the Navy:  
  
1. Copy and Paste **page three** of this document or hand write comments. Sign and send. Your written comments can include all 11 in one document.

2. Be sure to include your name address etc.

3. SEND TO:  
 EA-18G Growler EIS Project Manager  
 Naval Facilities Engineering Command Atlantic  
 Attn: Code EV21/SS  
 6506 Hampton Boulevard  
 Norfolk, VA 23508

**3.** COME TO THE Lopez Library: Sunday, January 22, 3-5pm, and talk with QUIET SKIES folks, with computers, who will help you send comments either by mail or online. DONE!

**Frequent Questions:**

Q. Should we write our feelings and concerns? **A.** Actually NO. We are in the Draft phase of the Environmental Impact Statement (DEIS). Comments need to address specific problems with references which support our statements. Saying that "we don't like the Growlers" is basically useless.

BUT! HERE'S THE GOOD NEWS: QUIET SKIES has combed through the DEIS and has created 11 comments with supporting references. It would be good if we -ALL- sent in all eleven.

**Q.** I wrote my comments at the Navy meeting. Do I need to do it again? **A.** YES. Since the meeting, new information has surfaced. It would be so helpful if we all sent in the 11 comments that are attached below.

**Q.** Is it OK to copy and paste all 11 comments (on page 3)? Won't we be all be saying the same thing? **A.** Yes we will. At this point the Navy will be sorting comments by subject. Subjects that get more comments may get further study. So, if we all copy and paste - all 11 comments - THIS IS A GOOD THING.

**Q.** If I have a comment - not on the list of Eleven, should I send it? **A.** Absolutely! You may have discovered an area Quiet Skies has missed. Let us know what it is and we will share it with the wider community.

To see what others have written, check out the letters on the Quiet Skies website (www.quietskies.info).

**Q.** Is it better to enter comments online or by USPS? **A.** The goal is to send the comments in - all eleven - if possible! It might be easier for the Navy to receive ONLINE - But - U.S.Mail is fine.

**Q.** What are we hoping to accomplish by sending in the comments? **A.** THERE IS A GOAL: Comment #11 addresses it (see attachments below): The DEIS is flawed. We are hoping that the Navy will be forced to produce a revised Draft which will address all the deficient areas and will require further comments before the Final EIS is prepared.

THERE IS ONE MORE GOAL: If the Navy ignores the comments - There could be a law suit - and - to have standing (the ability to participate), you must have submitted a comment in the DRAFT STAGE.

So, Please, take a few minutes, send in your comments. Don't wait for the

**For more information, updates and flight schedules:** www.quietskies.info

**Report Jet Noise**: sjcgis.org/aircraft-noise-reporting/

**Facebook**: https://www.facebook.com/quietskiesoversanjuancounty

**NEW DEADLINE of February 24 - DO IT NOW!**

The Navy is counting on the fact that we won't comment.

Spread the word!

**Now, PAGE THREE lists suggested comments.**

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations**

**at Naval Air Station Whidbey Island Complex January, 2017 Comments**

**ISSUE 1.** The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

**COMMENT 1: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**

**ISSUE 2.** Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

**COMMENT 2: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**

**ISSUE 3.** NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

**COMMENT 3: Redo the noise simulation using the more recent Advanced Acoustic Model.**

**ISSUE 4.** The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

**COMMENT 4: Noise levels should only be averaged over active flying days.**

**ISSUE 5.** The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

**COMMENT 5: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**

**ISSUE 6.** The Draft includes some independent noise measurements and ignores others.

**COMMENT 6: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

**ISSUE 7.** The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. NEPA protection was granted prior to the establishment of the SJI National Monument.

**COMMENT 7: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

**ISSUE 8.** The three Alternatives considered in the Draft are very similar and are based on old technology - a piloted jet that requires constant pilot training for safe carrier landing.

**COMMENT 8: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

**ISSUE 9.** The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**COMMENT 9: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

**ISSUE 10**. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures are addressed, there is no commitment.

**COMMENT 10: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

**ISSUE 11.** The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**COMMENT 11: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_