

QUIET SKIES

Over San Juan County



Navy Environmental Impact Statement (EIS) for the Growler

HOW TO SUBMIT EIS SCOPING COMMENTS

STEP ONE: Choose one of the scoping comments as suggested in this document. Sending one comment per online submission is more effective. We ask that you submit all nine comments so the issues are covered. If you find this too tedious, submit all nine at once.

We recommend that you submit your comments online, though written comments are certainly accepted. Online comments do not have to have physical addresses. Everything we write is in the public domain. If you don't want your address out there don't type it in. Your online comment will be accepted without a physical address.

STEP TWO: Start your letter with a BRIEF paragraph on who you are, where you live and how the noise is affecting you.

STEP THREE: Personalize the scoping comment you have chosen if you wish. Copying and pasting from this document is also fine.

STEP FOUR: Each comment letter should include a statement about what you want the Navy to study in the EIS. The bold print on the Sample Scoping Comments on pages 2–7 of this document are the suggestions for what the Navy should do or study.

For your convenience, this document also includes nine sample Scoping Letters, on pages 8–13, which you may use as the basis for personalizing your comments.

STEP FIVE: Please submit your comments BY JANUARY 9, 2015.

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

Or by mail:

EA-18G Growler EIS Project Manager
Naval Facilities Engineering Command Atlantic
6506 Hampton Boulevard Norfolk, VA 23508 Attn:
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Questions? quietskiessanjuan@gmail.com Or: <http://www.quietskies.info>

Navy Environmental Impact Statement for the EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island

Scoping Comments Fall 2014

1. Analysis

Analysis in the 2005 and 2012 Growler Environmental Assessments (EAs) was inadequate to support the findings. The Navy must enhance the analysis in order to support proposed actions in the Environmental Impact Statement (EIS).

- A. In the 2012 EA, Figure 3-4, Projected 2013 DNL Noise Contours for Ault Field and OLF Coupeville indicates that San Juan County (SJC) is outside the affected area. This does not reflect citizen experience. We experience Growler activity that is loud and disruptive. Possible factors may include flights at lower elevation than assumed and ducting of jet noise between water and clouds. It is good engineering practice to verify computer simulations with actual measurements. **Conduct continuous sound measurements in the southern portion of SJC over a one-month period.**
- B. Sound measurements and analysis in the EAs used the A Weighting. This approximates the response of the human ear and according to the cited studies in the EAs is linked to hearing loss and annoyance. Growler engine noise has a signature low frequency component that is ignored by A Weighting. There is substantial evidence that low frequency sounds have deleterious health impacts beyond annoyance as addressed in other comments. Growler sound measurement with C Weighting, which includes most of the low frequency spectrum, is expected to be 10 to 20 dB higher than A Weighting. We believe that C Weighting would also indicate that the Growler events are louder than the Prowler. A fundamental assumption in the EAs, that the Growler is quieter, is incorrect. **Include C Weighted sound measurements and analysis in the EIS.**

Reference:

Low Frequency Noise Study; Hodgdon, Atchley, Bernhard; April 2007
<http://web.mit.edu/aeroastro/partner/reports/proj1/lfnreport-2007-001.pdf>

- C. For decades studies of airport noise have used the Day-Night Average (Ldn) metric for assessing impacts. This may be appropriate for airports with typical operations 16 hours a day, 7 days a week. The noise experienced during Growler training flights is intermittent. We have days without activity. It occurs in a region with very low background noise of 35 – 45 dBA (outside measurement). This is lower than the “quiet suburban neighborhood” background noise level cited in the Wyle report for the 2012 EA. The “startle factor” is a component of the adverse health impacts that would be better represented by a short duration noise measurement. **The EIS analysis should incorporate supplemental noise measurements including Sound Exposure Level (SEL) and Peak Sound Level (Lmax) in addition to Ldn. Document the projected annual number of events that exceed 60 dB SEL and Lmax in 5dB increments throughout the impacted areas including San Juan County.**

Reference:

Mestre, V., et. al.: Technical Support For Day/Night Average Sound Level (Dnl) Replacement Metric Research, Final Report, 14 June 2011, Section 6.1, last paragraph.

- D. We understand that noise measurements and projections in the EAs assume that afterburners are not in use. We understand that afterburners are used at times including takeoffs and FCLPs. **Sound measurement and analysis in the EIS should include afterburners or the Navy should commit in the mitigation section of the Record of Decision (ROD) to not use afterburners in training flights.**

2. Health Effects Related to Startle Reaction from Growler Training

San Juan County has a low background noise of 35 – 45 dBA (outside). County residents are routinely exposed 90 – 114 dBA (outside) blasts of noise from Growler over flights and operations at Ault Field resulting in startle reactions. This noise is perceived subconsciously by the human body as a danger signal. The body reacts with fight or flight response with resultant nervous, hormonal and vascular changes. The jet noise experienced is not unlike the noise of an earthquake, a strong wind or a chimney fire. Research shows that humans do not become accustomed to repeated noise at this level.

References:

Kryter K: Physiological, Psychological, and Social Effects of Noise (pub 1115), National Aeronautics and Space Administration, Washington, pp. 535- 545, 1984.

Hall, FL., Birnie, SE, Taylor, SM, Palmer, JE: Direct Comparison of Community Response to Road Traffic Noise and To Aircraft Noise, J. Acoust. Soc. Am. 70:1690-1698, 1981.

The EIS should address the health effects of “Startle Reactions.” Conduct medical surveys on the impacted populations including San Juan County. Mitigation should be put in place for all Growler activity.

3. Health Effects Related to Loss of Control

Residents of San Juan County experience Growler jet noise at all times of the day and night. The noise ranges from 65 – 110 dBA and 75 – 124 dBC (inside) and is the result of over flights, engine testing and training operations.

Naval Air Station Whidbey Island does not publish a schedule of training operations for Ault Field. As a consequence, residents never know if a blast of noise is going to be a single 30 second event or the beginning of 3 hours of noise from training. This severely impacts quality of life, use of property and has health consequences. Surveys show that loss of control over one’s life is one of the most disturbing effects of low level military over flights and/or sonic booms on rural Americans.

Reference:

Lundberg U, Frankenhaeuser M: Psychophysiological Reaction to Noise as Modified by Personal Control over Noise Intensity. *Biol Psychol*, 6:51-59, 1978.

Singer JE, Acri JB, Schaeffer MH: Cognitive Changes from Noise Exposure. In Bergland B, Lindvall T (eds): *Noise as a Public Health Problem. New Advances in Noise Research* (volume I of proceedings of the 5th international congress on noise as a public health problem, held in Stockholm, Aug. 21-25, 1988), Swedish Council for Building Research, Stockholm, pp 401-410, 1990.

Bargen R: *Airspace Blues*, Airspace, Gabbs, Nev, p 424, 1989.

The EIS should address the issue of Loss of Control. Mitigation should include notifying citizens in advance of all Growler training operations at either airfield including Field Carrier Landing Practice (FCLP) and Controlled Carrier Approaches (CCAs).

4. Health Effects of Jet Noise on Children

On Lopez Island the Growlers routinely fly over our school in the middle of the island and over Lopez Village where our Preschool and Children's Center is located. Research shows that children can be very distressed over military jet over flights. Behaviors in children may include: terror, panic, screaming, freezing in place, palpitations, shaking, dizziness, bed wetting, sleep disturbances, nail biting, anxiety, and elevation of blood pressure.

References:

Goldman B: Sheshatshit, Labrador A Town without Hope. *Can Med Assoc J*, 141:602-605, 1989. 1162 (b)(6) Page 13 of 23.

Bartels K: Medizinische/psychosomatische Auswirkung von Lärmflug. In *Kinder und Tiefflug. Dokumentation des Expertenforums zu den Auswirkungen des Tiefflugarms auf Kinder*, Bonn, June 12, pp 18-22, 1989.

Preuss S: Militärischer Lärmflug Und Seine Psychischen Auswirkungen Auf Kinder. In *Kinder und Tiefflug. Dokumentation des Expertenforums zu den Auswirkungen des Tiefflugarms auf Kinder*, Bonn, June 12, pp 3-8, 1989.

The EIS should specifically address the issue of Growler noise on children. Parents, teachers and children should be questioned about behavioral responses to Growler noise. Mitigation should include shifting flight patterns to avoid the Lopez Island School and Lopez Village.

5. Health Effects Due to Sleep Disturbance

San Juan County residents regularly experience Growler jet noise between the hours of 8 pm and 12 midnight. During the summer the noise often continues to 1 am. The indoor threshold for falling asleep is 35-40 dBA. San Juan County resident's noise journals show that indoor sound levels from FCLP's at Ault field range from 57 – 80 dBA. If the low frequency noise is measured the sound levels range from 77 – 100 dBC. Windows rattle, bodies vibrate and ear protection does not help. Using the Day-Night Average (Ldn) noise

measure does not take into account that our bodies **do not average** sleep loss. Noise annoyance during the night increases noise annoyance for the following 24 hours.

Noise disruptions and sleep disturbance can lead to health disorders and interfere with convalescence from illness. Low frequency sound, such as the Growler emits, is significantly disturbing even at low sound pressure levels.

References:

LeVere T, Morlock G, Hart, F: Waking Performance Decrements Following Minimal Sleep Description: The Effects of Habituation during Sleep, *Physiological Psychology*, 3:147-174, 1975.

Kryter, Ran D., *Analysis of Laboratory and Field Data on Awakening from Noise*, 1988.

Lukas, J., *Measures of Noise Level: Their Relative Accuracy In Predicting Objective and Subjective Responses to Noise During Sleep*. EPA-600/1-77-0 10, U.S. Environ. Prot. Agency, Feb. 1977.

Griefahn, Barbara. *Research on Noise-Disturbed Sleep since 1973*. In *Proceedings of the Third International Congress on Noise as a Public Health Problem*. ASHA Report No. 10, April 1980.

Griefahn, B Muzet, A: *Noise Induced Sleep Disturbances and Their Effects on Health*. Institut Feur Arbeits und Sozialmedizin, Universitaet Mainz, West Germany and Centre d'Etudes Bioclimatiques due CNRS, France.

The EIS should address sleep disturbance. A survey of the residents in the study area including San Juan County should document the extent of this problem. An Alternative that removes FCLP and CCA practice from Ault field between 2000 and 0800 hours should be developed and studied.

6. Alternatives

The Proposed Action Statement in the EIS States:

"The alternatives include variations of the following factors:

1. *Total number of aircraft to be purchased*
2. *Number of aircraft assigned per squadron*
3. *Number of land-based squadrons.*
4. *The distribution of aircraft operations at NAS Whidbey Island between Ault Field and OLF Coupeville"*

There are no alternatives that base the Growlers at a location other than NAS Whidbey Island. Section 1500.14 of the Council on Environmental Quality regulations requires that Agencies shall

*"(a) Rigorously explore and objectively evaluate all **reasonable** alternatives"*

We believe that alternatives should not be dismissed just because they are higher in cost or not as efficient. **The EIS should fully evaluate one or more alternatives that bases Growlers at a location other than NAS Whidbey Island.**

7. Mitigation

We want the Navy to implement all feasible measures to reduce the noise impacts of Growler training flights on citizens including San Juan County. In preparing an Environmental Impact Statement (EIS) the Council on Environmental Quality regulation 1502, section 14 on Proposed Alternatives states,

“In this section agencies shall: ... (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.”

We believe that the 2005 and 2012 Environmental Assessments incorrectly determined that there was no adverse noise impact. Therefore it was inappropriate not to evaluate noise mitigation. **At a minimum the following mitigation measures must be fully considered. All selected mitigation measures should be included in the Record of Decision (ROD) along with timelines for completion.**

- a) **Growler training flight paths from NAS Whibey Island (map on page 11 of the scoping booklet) should be modified to minimize routes over populated areas including the south end of Lopez Island to the greatest extent possible.**
- b) **Growler training flights over populated areas including San Juan County should be above 3,000 feet elevation.**
- c) **Afterburners should not be used on Growler training flights over North Puget Sound.**
- d) **A Ground Run-up Enclosure or Hush House should be used for noise suppression during all Growler training engine run-ups and testing.**
- e) **Test, acquire and deploy noise reduction measures for the General Electric F414 engines used on the Growlers.**
- f) **Notify citizens in advance of all Growler training operations at either airfield including Field Carrier Landing Practice (FCLP), Controlled Carrier Approaches (CCA's).**

8. Economic Impacts

The San Juan County Comprehensive Plan states, "...the islands are places of peace.... We support a pattern of economic growth ... which recognizes the rural, residential, quiet, agricultural, marine and isolated nature of the islands." The quiet and pristine nature of the islands with its marine protected areas, National Monuments and National Historical Parks attracts organic agriculture, lovers of nature, cyclists, hikers, kayakers, sailors, summer residents and retirees. Some visitors who have experienced the jet noise have stated that they will never return. Continuation of the current level of jet noise, let alone increasing the number of jets, will discourage visitors and reduce property values. Not including Alternatives that base additional jets at other locations due to higher costs to the Navy does not consider the broader economic consequences for the region. **The EIS should address economic impacts throughout San Juan, Whatcom, Skagit, Jefferson and Island Counties.**

9. Insufficiency of the 2005 and 2012 Environmental Assessments

The 2005 and 2012 Environmental Assessments (EAs) are deficient in the following areas as noted in numerous comments.

- Analysis
- Human health consequences
- Alternatives
- Mitigation
- Economic consequences

This EIS should conduct all analysis from the beginning and should not rely on, or tier off of, the analysis and Records of Decision for the 2005 and 2012 Environmental Assessments.

Sample Scoping letters

Sample Scoping Letter for # 1 Analysis:

I have lived on the south end of Lopez Island since 1979. In the last year noise and over-flights from the Growlers at Ault field has exceeded anything we have experienced in the last 35 years. All the reasons we have chosen to live here are being degraded by the constant noise, vibration and intrusive over-flights of Growlers. The Navy considers San Juan County (SJC) a “no significant impact area”. This is clearly false.

Analysis in the 2005 and 2012 Growler Environmental Assessments (EAs) was inadequate to support the findings. The Navy must enhance the analysis in order to support proposed actions in the Environmental Impact Statement (EIS).

The EIS should study the following:

A. Conduct continuous sound measurements in the southern portion of SJC over a one-month period.

B. Include C-Weighted sound measurements and analysis in the EIS.

C. The EIS analysis should incorporate supplemental noise measurements including Sound Exposure Level (SEL) and Peak Sound Level (Lmax) in addition to Ldn.

Document the projected annual number of events that exceed 60 dB SEL and Lmax in 5 dB increments throughout the impacted areas including San Juan County.

D. Sound measurement and analysis in the EIS should include afterburners or the Navy should commit in the mitigation section of the Record of Decision (ROD) to not use afterburners in training flights.

Sincerely

Your Name

Sample Scoping letter for #2 Health Effects Related to Startle Reaction from Growler Training:

I live in the Islandale area of South Lopez and work from home. We experience Growler noise usually 5 days a week often starting at 8am and continuing until 9 -10 pm in the winter and 12 pm – 1 am in the summer. One of the most difficult aspects for me is the Startle effect. We get sporadic blasts of noise throughout the day ranging from 75 – 113 decibels. I can feel my adrenalin kick in and my blood pressure rises. This constant noise is definitely affecting my health.

References:

Kryter K: Physiological, Psychological, and Social Effects of Noise (pub 1115), National Aeronautics and Space Administration, Washington, pp. 535- 545, 1984.

Hall, FL., Birnie, SE, Taylor, SM, Palmer, JE: Direct Comparison of Community Response to Road Traffic Noise and To Aircraft Noise, J. Acoust. Soc. Am. 70:1690-1698, 1981.

The EIS should address the health effects of “Startle Reactions.” Medical surveys

should be conducted on the impacted populations including San Juan County. Mitigation should be put in place for all Growler activity.

Sincerely

Your Name

Sample Scoping letter for #3 Health Effects Related to Loss of Control

I live on the east side of Lopez Island. Over-flights and blasts of noise and vibrations from Growlers and operation at Ault Field are degrading many of the reasons we chose to live on the island.

When the jets are flying the noise is often so intense that conversation stops. Naval Air Station Whidbey Island does not publish a schedule of training operations for Ault Field. As a consequence, residents never know if a blast of noise is going to be a single 30 second event or the beginning of 3 hours of noise from training. This severely impacts quality of life, use of property and has health consequences. Surveys show that loss of control over one's life is one of the most disturbing effects of low level military over flights and/or sonic booms on rural Americans.

Reference:

Lundberg U, Frankenhaeuser M: Psychophysiological Reaction to Noise as Modified by Personal Control over Noise Intensity. Biol Psychol, 6:51-59, 1978.

Singer JE, Acri JB, Schaeffer MH: Cognitive Changes from Noise Exposure. In Bergland B, Lindvall T (eds): Noise as a Public Health Problem. New Advances in Noise Research (volume I of proceedings of the 5th international congress on noise as a public health problem, held in Stockholm, Aug. 21-25, 1988), Swedish Council for Building Research, Stockholm, pp 401-410, 1990.

Bargen R: Airspace Blues, Airspace, Gabbs, Nev, p 424, 1989.

The EIS should address the issue of Loss of Control. Mitigation should include notifying citizens in advance of all Growler training operations at either airfield including Field Carrier Landing Practice (FCLP) and Controlled Carrier Approaches (CCA).

Sincerely

Your Name

Sample Scoping Letter for #4 Health Effects of Jet Noise on Children

I live near the school on Lopez Island. The jets didn't used to fly over the school and now they do. They also routinely fly over the preschool in Lopez Village. Growler traffic over my home is definitely affecting my life. What used to be a quiet peaceful place to live now regularly is filled with the sounds of a war zone. Ear protection does nothing. My windows vibrate. My body vibrates. I am concerned about the effects on the children at our school and our preschool.

Research shows that children can be very distressed over military jet over flights. Behaviors in children may include: terror, panic, screaming, freezing in place, palpitations, shaking, dizziness, bed wetting, sleep disturbances, nail biting, anxiety, and elevation of blood pressure.

References:

Goldman B: Sheshatshit, Labrador A Town without Hope. Can Med Assoc J, 141:602-605,1989.1162 (b)(6)
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Bartels K: Medizinische/psychosomatische Auswirkung von lieffluglarm. In Kinder und Tiefflug.
Dokumentation des Expertenforums zu den Auswirkungen des Tieffluglarms auf Kinder, Bonn, June 12, pp 3-18-22, 1989.

Preuss S: Militarischer Jiefflug Und Seine Psychischen Auswirkun gen Auf Kinder. In Kinder und Tiefflug.
Dokumentation des Expertenfonims zu den Auswirkungen des Tieffluglarms auf Kinder, Bonn, June 12, pp 3-8, 1989.

The EIS should specifically address the issue of Growler noise on children. Parents, teachers and children should be questioned about behavioral responses to Growler noise. Mitigation should include shifting flight patterns to avoid the Lopez Island School and Lopez Village.

Sincerely

Your Name

Sample Scoping Letter for #5 Health Effects Due to Sleep Disturbance

I have enjoyed living on Lopez Island for over 20 years. One of the wonders of living here has been the quiet nights and being able to hear the waves, the sea lions, the wind and all the night sounds. The Growlers have destroyed this. We regularly experience jet noise between 8pm and 12 midnight. In the summer the noise can continue until 1am.

Research shows that the indoor threshold for falling asleep is 35-40 dBA. Our noise journals show that indoor sound levels from FCLP's at Ault field range from 57 – 80 dBA. If the low frequency noise is measured the sound levels range from 77 – 100 dBC. Windows rattle, bodies vibrate and ear protection does not help. It's unthinkable that the Navy considers San Juan County and Lopez Island a "no significant impact noise area"! Averaging noise over a year is useless when you're trying to sleep. **Our bodies do not average sound. I feel that living with the sleep disruptions from the Growlers is affecting my health.**

References:

LeVere T, Morlock G, Hart, F: Waking Performance Decrements Following Minimal Sleep Description: The Effects of Habituation during Sleep, Physiological Psychology, 3:147-174, 1975.

Kryter, Ran D., Analysis of Laboratory and Field Data on Awakening from Noise, 1988.

Lukas, J., Measures of Noise Level: Their Relative Accuracy In Predicting Objective and Subjective Responses to Noise During Sleep. EPA-600/1-77-0 10, U.S. Environ. Prot. Agency, Feb. 1977.

Griefahn, Barbara. Research on Noise-Disturbed Sleep since 1973. In Proceedings of the Third International Congress on Noise as a Public Health Problem. ASHA Report No. 10, April 1980.

Griefahn, B Muzet, A: Noise Induced Sleep Disturbances and Their Effects on Health. Institut Feur Arbeits und Sozialmedizin, Universitaet Mainz, West Germany and Centre d'Etudes Bioclimatiques due CNRS, France.

The EIS should address sleep disturbance. A survey of the residents in the study area including San Juan County should document the extent of this problem. An Alternative that removes FCLP and CCA practice from Ault field between 2000 and 0800 hours should be developed and studied.

Sincerely

Your Name

Sample Scoping Letter for #6 Alternatives

I have lived on Lopez Island for many years. The jets from NASWI have not bothered me much until this last year. Now I experience them all over the Island. If I want to walk on our new National Monument lands at Iceberg Point they are the predominant sound - not birds or waves or sea lions. If I'm in the Village I experience them often with their deafening vibrations. Even at our ferry landing at the north end their noise is not uncommon. I recently visited a friend on Shaw Island. The noise was intrusive there. At night when the island used to be quiet the hours of blasting and roaring can be heard until late at night.

I do not understand why this EIS does not include an Alternative that would base Growlers somewhere other than NASWI. Section 1500.14 of the Council on Environmental Quality regulations requires that Agencies shall *"(a) Rigorously explore and objectively evaluate **all reasonable** alternatives.*

The introduction of the Growler is negatively impacting San Juan County and the whole region. Alternatives should not be dismissed just because they are higher in cost or not as efficient. **Adding any Growlers to an already significantly affected area is unjustified. I know that there are other possibilities where Growler training and basing can happen.**

The EIS should fully evaluate one or more alternatives that bases Growlers at a location other than NAS Whidbey Island.

Sincerely

Your Name

Sample Scoping Letter for #7 Mitigation

As a long time San Juan County resident I am now planning trips to Seattle to experience quiet. This is ridiculous. The Navy should be implementing immediate noise mitigations to reduce the noise impacts of Growler training flights on citizens throughout the region including San Juan County. In preparing an Environmental Impact Statement (EIS) the Council on Environmental Quality regulation 1502, section 14 on Proposed Alternatives states,

"In this section agencies shall: ... (f) Include appropriate mitigation measures not already included in the proposed action or alternatives."

I believe that the 2005 and 2012 Environmental Assessments **incorrectly determined** that there was no adverse noise impact from the introduction of the Growlers. Therefore it was inappropriate not to evaluate noise mitigation. **At a minimum the following mitigation measures must be fully considered. All selected mitigation measures should be included in the Record of Decision (ROD) along with timelines for completion.**

- a) Growler training flight paths from NAS Whibey Island (map on page 11 of the scoping booklet) should be modified to minimize routes over populated areas, including the south end of Lopez Island, to the greatest extent possible.**

- b) Growler training flights over populated areas including San Juan County should be above 3,000 feet elevation.**
- c) Afterburners should not be used on Growler training flights over North Puget Sound.**
- d) A Ground Run-up Enclosure or Hush House should be used for noise suppression during all Growler training engine run-ups and testing.**
- e) Test, acquire and deploy noise reduction measures for the General Electric F414 engines used on the Growlers.**
- f) Notify citizens in advance of all Growler training operations at either airfield including Field Carrier Landing Practice (FCLP) and Controlled Carrier Approaches (CCA).**

Sincerely

Your Name

Sample Scoping Letter for #8 Economic impacts

We moved here because of the beauty and the quiet. The Growlers are changing the quality of life in San Juan County. We would never have bought property here if we had experienced the intrusive noise from NASWI.

The San Juan County Comprehensive Plan states, "...the islands are places of peace.... We support a pattern of economic growth ... which recognizes the rural, residential, quiet, agricultural, marine and isolated nature of the islands." The quiet and pristine nature of the islands with its marine protected areas, National Monuments and National Historical Parks attracts organic agriculture, lovers of nature, cyclists, hikers, kayakers, sailors, summer residents and retirees.

We have talked to visitors who have experienced the jet noise and have stated that they will never return. Continuation of the current level of jet noise, let alone increasing the number of jets, will discourage visitors and reduce property values.

The EIS should address economic impacts throughout San Juan, Whatcom, Skagit, Jefferson and Island Counties.

Sincerely

Your Name

Sample Scoping Letter for #9 Insufficiency of the 2005 and 2012 Environmental Assessments

I have been following the EIS process for the past year. It appears that both the 2005 and the 2012 Environmental Assessments were deficient and incomplete. The Growlers were moved to NASWI without a full EIS and without sufficient study of noise impacts, health consequences, plans for mitigation of noise from the Growlers, and economic impacts to the region. The low frequency noise which is the signature noise of the Growler was not even considered. San Juan County was considered a "no significant impact area". Clearly this is not the case.

This EIS should conduct all analysis from the beginning and should not rely on, or tier off of, the Records of Decision for the 2005 and 2012 Environmental Assessments.

Sincerely
Your Name