



# Quietskies

## Over San Juan County

### Update: January 9, 2017

As we settle into the new year, our Quiet Skies priority is to send as many **Draft Environmental Impact Statement (DEIS) comments** as possible to the Navy by the January 25, 2017 deadline. There is a possibility there may be a 30 day extension - but - LET'S GET THIS DONE!

In 2014, in the Scoping Process, our comments focused on asking the Navy to study the impacts of different aspects of adding 36 more Growlers to NASWI. They have done that and have presented us with 3 alternatives in a 1,500 page Draft Environmental Impact Statement (DEIS).

**NOW - WE NEED TO SEND COMMENTS ON THE DEIS.** In the DRAFT EIS it doesn't work to say "we don't want 36 more Growlers and 47% more Growler traffic". For our comments to be considered, we need to identify specific areas that are flawed, have errors in analysis, things that should be clarified or represent different alternatives from the 3 the Navy has specified.

**TO MAKE COMMENTING EASY,** a few intrepid Quiet Skies folks have poured through the 1,500 pages of the DEIS and come up with 11 comments (included below on page 3) which can be copied and pasted into the Navy online comment form, or printed out and sent with your name and address via the U.S Postal Service.

These comments are supported by explanations, facts, references, DEIS page numbers and paragraphs which will be accessible on the Quiet Skies Website by January 15th.

Quiet Skies will send an official sheet containing the comments and including the references to the Navy so we do not have to individually reproduce all the supporting materials.

#### **FOR ADDITIONAL SUPPORT:**

**Attend a help session at the Lopez Library, Community Room:**

**\*\*\* Wednesday, January 11, 5-7pm**

**\*\*\* Sunday, January 22, 3-5pm**

All the documents in this email plus support information and more are available on the Quiet Skies website: [www.quietskies.info](http://www.quietskies.info)

**The NEXT PAGE provides instructions for submitting comments.**

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

**SENDING IN COMMENTS IS VITAL. This is the way to force the Navy to address the deficiencies. Comment #11 speaks to this. The DEIS is full of flaws.** Deadline for comments: January 25, 2017

## **There are 2 ways to submit comments:**

### **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.

### **U.S MAIL:**

For a prepared comment document that you can print, sign and mail to the Navy:

1. Copy and Paste the comments below or hand write comments. Written comments can include all 11 (below) 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

**Please contact us if you need help: [quietskiessanjuan@gmail.com](mailto:quietskiessanjuan@gmail.com)**

**WE HAVE PREPARED 11 COMMENTS FOR YOUR CONSIDERATION AND USE.**

**GO TO THE NEXT PAGE.**

**For more information, updates and flight schedules:**

[www.quietskies.info](http://www.quietskies.info)

**Report Jet Noise:** [sjcgis.org/aircraft-noise-reporting/](http://sjcgis.org/aircraft-noise-reporting/)

**Facebook:**

<https://www.facebook.com/quietskiesoversanjuancounty>

**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: \_\_\_\_\_

**Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)**

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