

# CITIZENS OF EBEY'S RESERVE

*protecting our land, homes, and health*

## DOCUMENT 2:

August 7, 2014

### COER RESPONSE TO NAVY'S JUNE MEMORADUM TO AMEND THE CURRENT GROWLER EIS

In response to a COER Freedom of Information request, the Navy recently disclosed, in a June 16<sup>th</sup> Memorandum from Rear Admiral K. R. Slates, that they intend to “re-scope” the current EA18-G “Growler” NEPA EIS to examine three new alternatives. Each of these alternatives increases the number of Growlers. The Navy is looking to add up to 34 additional Growlers, taking the current operational level from 82 up to a possible total of 116 Growlers with all Growlers continuing to be based at NAS Whidbey Island. The new alternatives would also do away with the “expeditionary squadron” classification. If implemented all Growlers would be designated as “carrier-based” requiring that all conduct Flight Carrier Landing Practices (FCLP’s). This change would necessitate an increase in the number and tempo of training operations at OLF Coupeville and over the North Puget Sound region. This “re-scoping” would push the timeline for a Draft EIS to be released to the public from sometime in 2015 into 2016.

EIS amendments are allowed pursuant to NEPA regulations. However, it appears any amendments must be made via the Federal Register and that the Navy must re-open the scoping process. It is unclear at this time as to whether these three new Navy alternatives may be added to the

existing EIS or whether these alternatives are sufficiently different to require that an entirely new EIS process be started.

The COER Board of Directors is issuing this policy paper in strong opposition to the amended Navy Growler EIS as it was detailed in Rear Admiral Slates June 16, 2014 memorandum.

**Background:**

The transition from EA6-B “Prowlers” to EA18-G “Growlers” was effected under the terms of a Navy 2005 Environmental Assessment (“EA”). That 2005 EA asserted that the Growlers would have less impact upon surrounding communities than the Prowlers had had because the Growlers were quieter and because the number of annual operations at the OLF would be decreased to an annual limit of 6,972 operations. Because of this “*less impact*” claim, the Navy was able to avoid performing a more detailed “Environmental Impact Statement” (“EIS”) as required by NEPA. That *less impact* claim later proved to be untrue.

The Growlers cause more noise than the Prowlers. Noise is defined as harmful sound. In 2013 COER engaged an independent noise study (JGL Noise Study, 2013) which found that the Growlers are both louder than the Prowlers for most operations and that the Growlers’ lower frequency levels are unsafe and harmful to the human body and organs. The testing was conducted at five locations around the Coupeville OLF. Maximum Growler sound levels exceeded hearing protection requirements and surpassed Washington State, U.S. Environmental Protection Agency and World Health Organization community noise protection guidelines at all five locations. Navy documents subsequently obtained by COER agree with the JGL Study and show that the Navy is clearly worried about the effects of jet aircraft noise on military personnel. The World Health Organization has focused on the dangers of jet aircraft noise on civilian populations. The Navy has acknowledged in other documentation just how much noise the Growlers generate. For instance, in the Navy’s P8 transition EIS it was stated that the noise of the P8s at NASWI would not be discernable because 98% of the noise at Ault Field is generated by Growlers.

Similarly, contrary to the Navy’s assertions in their 2005 EA that the

number of flight operations at the OLF would decrease, the number increased significantly. Navy information obtained by COER through FOIA requests show the following number of annual flight operations at the OLF:

2008 – 20,548 operations;  
2009 – 5,292 operations;  
2010 – 6,476 operations;  
2011 – 9,378 operations; and  
2012 – 9,669 operations.

In 2013 a total of 6,972 operations had been conducted through May when operations were suspended for 11 months following the filing of COER's NEPA lawsuit. With regard to this suspension, Captain Nortier, Commander of NASWI, acknowledged that operations at the OLF had been suspended because by May the Navy had already exceeded its 2005 EA numbers.

Following the filing of COER's lawsuit and the suspension of operations at the OLF, the Navy finally agreed to perform the current EIS and publicly stated that it would examine all Growler operations at NASWI and the OLF.

**Whether the Revised Growler EIS is by amendment or started anew, COER contends the Navy should include all of the following:**

- The DRAFT EIS should be completed by the end of 2015. It is unreasonable for the Navy to expect local civilian communities in four counties to wait longer than originally promised for a draft EIS initiated in 2013 while the Navy continues to conduct Growler operations over those affected communities. The new proposed 2016 date could theoretically continue to be pushed out in time with new amendments by the Navy -

delaying the draft and final EIS even longer. Preferably, all Growler operations should be suspended until the completion of the EIS process.

- Revised EIS Scoping meetings should be held in all North Puget Sound impacted communities including the San Juan Islands, Port Townsend, Camano Island and La Conner, not just in Coupeville, Oak Harbor and Anacortes as was done with initial Growler EIS scoping meetings. Every community which is impacted by Growler operations must be brought into the discussion in a meaningful way.
- The Revised EIS should start from a zero impact basis when considering Growler impacts. The Navy's past practice of avoiding its NEPA obligations by claiming there is "no significant additional impact" by bootstrapping from previous un-analyzed operations must stop. The Navy has never before published an EIS or other impact analysis determining whether any training at all should occur at the Coupeville OLF or over the North Puget Sound region. That analysis must be done now. COER contends that for the Navy to do an EIS which only considers adding more Growler squadrons to what is currently based at NASWI when no analysis was ever performed for bringing in either the Prowlers in the first place or for the transition from Prowlers to Growlers would not satisfy the requirements of NEPA. This Revised EIS must examine impacts on the communities compared to no military jet presence (Prowlers or Growlers) and no FCLPs or other low level operations.

- Cumulative Noise: In addition to examining the impacts of Growler noise, any EIS should also consider the cumulative noise impacts of all other military (remaining Prowlers, P3s and P8s) and civilian aircraft upon the affected communities. The Growlers do not operate in an isolated environment and the EIS should consider all aircraft noise impacts. Similarly, the analysis should not be limited to FCLPs but should examine the impact of all operations including high-level overflights and CCAs.
- At least one new alternative should be added to the Revised EIS which would consider relocating all FCLP and low-level Growler training out of the heavily populated North Puget Sound region. This alternative should include closing the Coupeville OLF. Alternative training locations away from human populations should be prioritized.
- The one-site policy for stationing all Growlers at NASWI was made prior to everyone understanding how loud, damaging and impactful their noise is on their surroundings. This policy should be reconsidered by the DOD and the Navy, as Puget Sound should not bear the sole responsibility for training pilots resulting in the degradation of Puget Sound's environment, health, economy, soundscape, and landscape and family-based culture.

**For more information and source material, please visit COER's website:**  
[www.citizensofeyebaysreserve.com](http://www.citizensofeyebaysreserve.com)

**Legislative Committee, COER, August 2014**

