Citizens of the Ebey's Reserve

For a Healthy, Safe and Peaceful Environment
P.O. Box 202
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November 25, 2024

Public Health Accreditation Board

1600 Duke Street, Suite 450

Alexandria, VA 22314

Intent

This is a complaint that addresses a deliberate intent by the Island County (WA) Health Department to suppress inclusion of two significant health issue in its Community Health Assessment (CHA). A 2024 University of Washington (UW) study[1], among other credible studies, revealed that the extreme noise created by the Navy's EA-18G Growler operations[2] in Island County is putting thousands of residents' health at risk. The county, however, turned a deaf ear to the issue, even though Citizens of Ebey's Reserve (COER) iteratively brought the matter to the attention of the county's CHA staff and team. The county similarly side-stepped addressing health issues related to contamination of drinking water by "forever chemicals" (e.g., PFAS, PFOS) brought about by the Navy's use of aqueous fire fighting foam (AFFF). Citizens of Ebey's Reserve (COER) believes these problematic dismissals of critically impactful health issues call for action by the Public Health Accreditation Board.

Brief History of COER's Involvement in the CHA

Anticipating that the County would avoid drawing any attention to the Growler noise and AFFF pollution issues, representatives of COER, Bob Wilbur and Michael Monson, attended the first and subsequent CHA Team (CHAT) meetings. They subsequently provided written and oral information to the team and the Assessment Supervisor, Taylor Lawson, delineating the need for the CHA to forthrightly address both the noise and water issues *(Appendix A)*.

Emails between Taylor Lawson, Bob Wilbur and Michael Monson followed through the end of September 2023, most dealing with questions for the health survey. COER was attempting to ensure that Growler noise and AFFF pollution were adequately addressed in the survey and provided the CHAT with substantiating data and information. Then, suddenly the CHAT group was disbanded, and the draft survey was withdrawn from the hired consultant, leaving the Community Health Advisory Board and staff to prepare a new survey. At that point Bob Wilbur

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1 https://www.nature.com/articles/s41370-024-00670-1#Sec13

2 https://citizensofebeysreserve.com/wp-content/uploads/2019/11/JGL-Acoustics-2019-Final-Report.pdf

informed Taylor Lawson that he would apply for a seat on the Advisory Board; that application was promptly rejected, and his appeal to reconsider was ignored *(Appendix B)*.

The CHA Survey

The survey (web page 85-89 of the CHA) of Island County residents basically failed in several critical ways to meet its objectives, i.e., "*to hear directly from Island County residents about the health needs that are most important* ***to them***" (page 13; emphasis added). As the CHA explained, the survey is the first step in the community health planning process and is used to identify community-wide priorities to improve health and quality of life. The intent of the survey is "*to better understand the health of our population and the factors that contribute to making us more or less healthy.*" (page 84)

The survey, however, did not ask of the responder's health priorities, but rather solicited their opinion of the most significant health needs confronting "the community." The general public at large is unlikely to be adequately enough informed to provide meaningful input on health needs at the community level. That seems to be a question one would ask of professionals in the health arena, not the general public. That questioning mistake introduced serious question over responder interpretation and response to those questions and hence, the efficacy of the survey results. That opens the door to misinforming the CHA and subsequently the Community Health Improvement Plan (CHIP).

Another major problem is that it was an opt-in survey, which are notoriously inaccurate, i.e., non-representative of the population as a whole. We pointed out at the first CHAT meeting that, for acceptable accuracy, participation in the survey should be randomized. That suggestion was ignored. Presentation of the results was limited to a single page in the CHA (page 65), a reflection of its weakness.

The CHA Report

Six survey questions (#7 to #12) addressed health issues and concerns, from which the CHA identified four four broad areas on which to focus: housing, mental health, access to care, and senior health and support (p. 34-60; 26 pages). There was no ranking of the import among those six questions, so each question was of equal weight. Yet one question—environmental effects on health (#12)—was passed over as an area of concern for the CHA to focus on, even though "*drinking water quality, quantity and systems*" was one of the top 3 or 4 overall concerns among survey responders (p. 65).

Given that, the choice to completely ignore environmental impacts is disturbing, especially since no cogent reason to do so was provided or apparent. By side-stepping environmental issues, it follows that the CHA made no mention of the Growler noise or AFFF issues, in spite of the reality that the health of thousands of people was being affected.

That avoidance flies in the face of a 2015 community health survey conducted by the County. That survey did directly query about aircraft (jet) noise, which is almost entirely Growler noise. Aircraft noise was consistently rated as the highest or within the top 3 daily challenges and health challenges (pages 23–27 and 39), with water quality rated just below jet noise (page 39)[3]. Since 2015, the Navy has increased Growler flights and noise significantly.

In the CHAT meetings Wilbur and Monson had also flagged to staff a 2021 study[4] by the town of Coupeville examining livability in central Whidbey. One of the questions asked was "What are you most concerned about for Coupeville"? The top three in order were: 1) impacts of military jet noise, 2) housing availability, and 3) impacts from increased growth and tourism. That too made no dent in the 2024 CHA.

Relatedly, the Washington State Department of Health in their 2017 comments on the Growler EIS expressed their concerns about Growler noise impacts on the population and a need for a "health impact assessment," which the Navy refused to conduct[5]. Instead of building on those prior surveys and the state's call for a health impact assessment, the 2024 CHA ran away from it.

Island County Health Department

The CHA lists four Island County divisions or *teams* that "ensure delivery of 10 Essential Public Health functions" (pages 6 & 7). Of those 10 essential functions, the jet noise and AFFF issues would have been pertinent to four of them: 1) assess and monitor public health; 2) investigate, diagnose, and address health hazards and root causes; 3) communicate effectively to inform and educate; 4) create, champion, and implement laws, policies, and plans (page 7).

But that pertinence was ignored. The CHA did not mention extreme Growler noise as a public health issue; nor did it mention contamination of water by AFFF chemicals as an unresolved issue. The attendant public health risks and impacts were instead quietly swept under the carpet, denying both a platform for the Community Health Improvement Plan (CHIP) to address. Hence, re the four above "essential functions" there would be no 1) assessments made, 3) no investigations into root causes, 3) no communication to inform the public, and 4) no plans to mitigate. That's a fourfold failure.

Environmental Health

One of the four Health Department divisions/teams is Environmental Health, which is listed as having these functions (page 9).

- Food Safety Permitting and Inspections

[3] https://www.islandcountywa.gov/DocumentCenter/View/4106/2015-Island-County-Community-Health-Survey
[4] https://townofcoupeville.org/wp-content/uploads/2022/01/Workshop-Presentation-Slides.pdf (see page 4)
[5] https://doh.wa.gov/sites/default/files/legacy/Documents/4000/DOH_DEIS_Comments.pdf

- Water Resource Management
- Shellfish Biotoxin Monitoring
- On-site Sewage System Permitting
- On-Site Sewage System Operation and Maintenance
- Recreation Water Inspections
- School Safety
- Outdoor Burn Permitting
- Zoonotic, Waterborne, and .Foodborne Disease Surveillance & Investigation
- Mobile Home Park Permitting.

None of those environmental functions deal with air, water, or noise pollution, all of which involve Navy jets. Given the significance of the well-documented noise and water pollution issues, not to exclude air pollution, the question is, why isn't there a bullet for pollution and why is the CHA silent on those significant public health issues?

Housing

The CHA devotes 10 pages (34–43) to substandard housing and housing shortages, but not one page or even a paragraph to the fact that Growler noise squeezes land availability because significant areas need to be rendered unfit for human occupation. On page 35 of the CHA, for example, concern is highlighted over sub-standard housing putting the well-being of children in jeopardy. Yet, the CHA makes no reference to in-home impacts of jet noise on child health and cognitive function. Hence, no basis is established to address and plan actions that might be taken to thwart or mitigate the significant damage risks.

Mental Health

The CHA also devoted 6 pages (44-49) to mental health, a very legitimate health issue. But it made no mention of the challenge of severe Growler noise on the mental health of at risk individuals. COER has heard from these folks; here, for example, are two excerpts taken from social media discourse:

- "*I'm a Disabled Vet from the Vietnam War. I am retired on SS and VA Disability. Along with all this noise, it really adversely affects my health. I served in the Navy during the 70's. I was in my 20's then, but 72 now. I don't recall reenlisting with the NAS to hear all this BS and Noise. It really bothers me. Some people who are much younger than I, say it's the sound of Freedom and that if I don't like the noise to sell and move. I cannot do that with my health as bad as it is.*"
- "*Many of the planes are going right over our home and those of our neighbors one after another! It is like they are going to land on our homes! Our autistic son is hidden in the bedroom with loud head phones on as he can't take it. I am feeling like I have PTSD myself because of the loud planes that literally shake the house/windows!*"

These are not unique stories, and every time the Growlers detonate their sound over these special needs people the impacts reignite.

Noise: Washington State Administrative Code

The State of Washington has promulgated code (WAC 297-817)[6] based on noise dose thresholds that safeguard workers from health-damaging noise; the military has adopted similar requirements. The code requires a wide variety of meaningful protection measures that employers must implement to determine noise exposure levels and protect their workers from noise doses that could harm their health.

The noise doses experienced by thousands[7] of Island County residents, however, far exceeds the state's and military's dose thresholds, as validated by internationally respected acoustics expert, Paul Schomer. He examined recorded noise levels at a county youth athletic field near Coupeville's touch-go practice field. Schomer found that just two Growler touch-go practice sessions of about 40 min each (i.e., about 40 overflights) exceeded the accepted monthly noise dose threshold. Growler practice, however, often exceeds two sessions in a single day, and there can be 10 to 20 practice days in a single month[8]. This too we passed on to the CHA Team, but the CHA failed to mention the issue.

Closing and Request

To provide public trust and confidence a Community Health Assessment should fully and forthrightly address all health-impact vectors, not avoid those that are inconvenient or might be presumed to be controversial or politically upsetting.

Given COER's persistent but failed attempts to ensure that the CHA acknowledge and address the Growler noise and AFFF impacts on public health and the county's clear intent to keep those pernicious issues from public view, COER argues that is cause for the Public Health Accreditation Board to withhold or withdraw Island County's accreditation until the CHA is revised and COER has a helpful seat at the revision table.

Respectfully submitted,

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cc: Island County Deputy Director of Public Health, Taylor Lawson
Island County Prosecuting Attorney, Greg Banks
Island County Commissioners: Janet St Clair, Melanie Bacon, Jill Johnson

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6 https://app.leg.wa.gov/wac/default.aspx?cite=296-817-20020

7 The exact numbers by noise contour band are available at https://citizensofebeysreserve.com/wp-content/uploads/2024/02/Section-4-MASTER-Pat-Waers.pdf

8 https://citizensofebeysreserve.com/wp-content/uploads/2023/10/DEIS-COER-Comments-1.pdf (see page 24)

Governor Elect, Bob Ferguson
The Honorable Patty Murray
The Honorable Maria Cantwell
The Honorable Rick Larsen
Executive Director, Whidbey Environmental Action Network, Marnie Jackson