**Citizens of Ebey's Reserve Review:**
**Section 106 Determination of Effect for Growler Operations at NASWI**
August 15, 2018

Citizens of Ebey's Reserve (COER) herein addresses our concerns regarding the June 16, 2018, "Section 106 Determination of Effect for the EA-18G 'Growler' Airfield Operations at the Naval Air Station Whidbey Island Complex" (hereafter, 106 DOE), which includes its Outlying Field (OLF) in Coupeville.

The current 106 DOE lists 18 actions to mitigate the impacts of Growler noise on the Ebey's Landing Historic Reserve (hereafter, the Reserve) and its visitors. None of the measures suggested, however, minimize the noise. They are irrelevant measures that have no impact on avoiding or resolving adverse effects.

The only real solution is to relocate the noise created by Growler flight carrier landing practice (FCLP) operations (see Figure 1) from Whidbey Island to an environmentally suited and community-welcoming location. That option may be less convenient for the Navy, but it far surpasses the Navy's continued insistence on trying to force carrier training where it no longer can work and simply does not belong.

Desecration of this nation's first Historic Reserve, is not an acceptable option. This historical heritage must have maximum protections, not trivial "mitigation" measures. Protecting this Reserve is a delicate balance between the community, the people, and the land. If these relationships are broken – the Reserve will be broken.

On September 1, 2016, COER submitted a 22-page comment (attached) on your initial Section 106 call for comments. In examining your current 106 DOE, we note that it failed to address nearly all of the concerns COER raised. Below, we highlight the most critical failures. They fall into three broad categories: (1) technical errors and shortfalls, (2) impacts of Growler FCLPs on the Reserve, and (3) non-validity of the OLF historical paradigm.

# 1. Technical Errors and Shortfalls

Instead of applying appropriate noise metrics, the 106 DOE ignored the problems and relied on the misleading day-night noise level (DNL).

There are numerous problems with using the DNL metric to evaluate impacts on buildings and on Reserve visitors. We do not dispute that the DNL is a widely used metric, but its purpose was to provide a measure of community annoyance to noise, not to assess the impacts of loud noise on buildings or on the national park visitor experience, which is a rather specialized, almost binary form of annoyance and harassment. The reliance of the 106 DOE on the DNL metric creates a number of misuse issues, examined below.

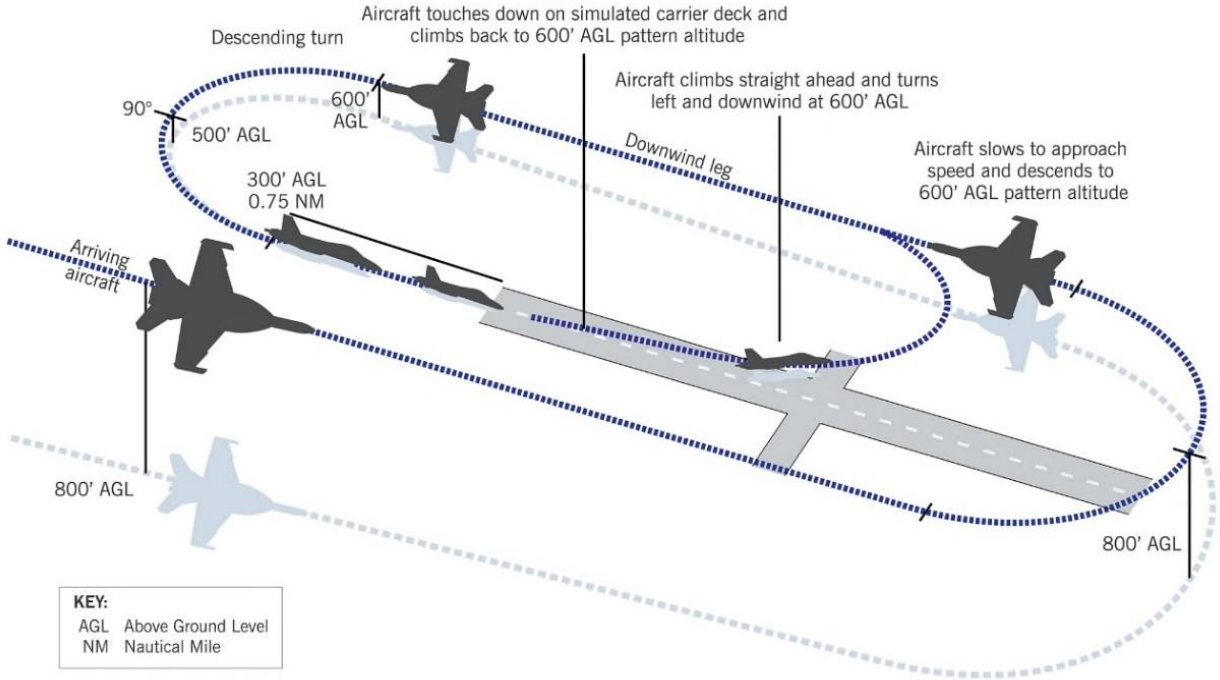


**Figure 1: Schematic of an FCLP on the northeaster circuit, Path 14. Note the altitudes above ground (AGL).**

**(a) "Substantive Change" not Defined.**—Page 55 of the 106 DOE speaks of areas where *substantive change* in DNL (delta DNL) was estimated via modeling.

There is reference to a 5% change, but it is not clear if that was supposed to equate to *substantive*. That is, there was no definition of what constituted "substantive" and whether it was defined before or after the noise modeling was conducted, or whether it is just a subjective call of some sort. The basis and rationale for "substantive" should have been decided and justified prior to conducting any analysis to determine delta DNA. That is established expectation that precludes post-results fudging and, hence, is normal scientific protocol.

**(b) Modeled DNL Contours without Verification**: Studies have revealed that modeled noise has significantly underestimated noise measurements taken on-site. A study of 36 sites around Raleigh–Durham airport found the modeled noise contours consistently underestimated the actual on-site contours by 5-15 decibels; that means actual noise levels were about 50% to 150% louder than NOISEMAP (1991–1998) and INM (1999–2002) models had projected.[1]

Modeled data does need to be verified with on-site data. The mere fact that "*the latest software*" was used, does not establish reliability without actual on-site validation, as stated by the World Health Organization[2]:

> While estimates of noise emissions are needed to develop exposure maps, measurements should be undertaken to confirm the veracity of the assumptions used in the estimates…As indicated in Chapter 2 modeling is a powerful tool for the interpolation, prediction and optimization of control strategies. However, models need to be validated by monitoring data…the accuracy of the various models available depends on many factors, including the accuracy of the source emissions data...

The 106 DOE modeled noise contours, however, are not validated by on-site measurements, so the contours cannot be reliably upheld. The Navy curiously continues to refuse on-site noise monitoring, although they have been asked to do so by the State of Washington and the Environmental Protection Agency, among many others.

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[1] Technical Report on Preparation of Day-Night Sound Level (DNL) Contours of Aircraft Noise During 2003 Raleigh-Durham International Airport North Carolina. March 2005. HMMH Report 295097.001 . Harris Harris Miller & Hanson, Inc., 15 New England Executive Park, Burlington, MA 01803
< http://198.1.119.239/~flyrduco/rduaircraftnoise/noiseinfo/downloads/RDU_2003_DNL.pdf >

[2] Berglund, B., Lindvall, T. and Schwela, D.H (Eds.). 1999. HWO. Guidelines for community noise. World Health Organization, Geneva. < http://www.bvsde.paho.org/bvsci/i/fulltext/noise/noise.pdf >

**(c) The 65-dBA DNL Now Invalidated.**—The military proclaims that it uses the best recent science available when conducting environmental assessments. This bold statement seems to conflict with its continued reliance on the now-defunct 65-dBA DNL as having some sort of scientific, yet unspecified function. The 106 DOE insufficiently attempts to justify its use simply because it has been widely used in the past.

The 65-dBA DNL was developed for only one purpose: To provide an index to assess community annoyance to noise. In 1992 the Federal Aviation Administration (FAA), based on a synthesis of 1978 studies, established in Regulation Part 150 that a maximum average DNL of 65 dBA or above is incompatible with residential communities. That 65 DNL was derived by the Federal Interagency Committee on Noise (FICON) based on a dose/response curve—the Schultz Curve—showing that 12.3% of the population is highly annoyed by aircraft noise at a 65 DNL. Accepting that, the FAA and Congress subsequently adopted 12.3% as the *annoyance threshold that should not be exceeded*, and 65 DNL subsequently became the standard.

The international scientific community, however, has recently found that the 1978 studies and Schultz dose/response curve were flawed, invalidating the 65 DNL threshold standard. On March 9, 2016, the International Organization for Standardization (ISO)—an independent, non-governmental organization of 162 national standards bodies, including the U.S.—published a revision of ISO standard on measurement and assessment of environmental noise. The revised ISO standard reflects 5 years of analysis by an ISO technical committee, which produced the new dose/response curve based on 21st century research. The American National Standards Institute (ANSI) version of the ISO standard followed and mirrored the ISO findings. Hence, there is ubiquitous concurrence of worldwide noise experts. Consequently, to be consistent with 12.3% annoyance standard, the correct high annoyance threshold level is actually 55 DNL. At 65 DNL approximately 25% are highly annoyed or double the allowable congressional standard.

It is entirely proper and to be expected that the Navy use "the best available science," but it cannot claim to honor and uphold science and concurrently rely on an undefendable, 40-year-old, scientifically discredited 65-dBA DNL.

**(d) Wrong DNL Averaging Method.**—Even though the 106 DOE should have used the 55 DNL, it is not really clear what use was intended for the 65 DNL. Presumably it was to provide insight on Reserve visitor experience and potential structural damage. Both those uses for the DNL are actually misuses. Exacerbating that misuse, even the DNL calculation method used was inappropriate and inconsistent with standard procedure.

There are two DNL types, one uses all 365 days as an average (called Average Annual Day or AAD) and the other is based on just the days of flying (Average Busy Day or ABD).

Which of those two well-established standards is used therefore depends on airport use. Airports used daily use AAD; those used intermittently should use ABD (busy days only). For example, if airport use is just 50 days per year, the DNL should be averaged over just those busy 50 days, not all 365 days. That is, to analyze noise annoyance, the evaluation must focus on the days when the noise is occurring. For example, to properly evaluate noise annoyance related to fireworks on the 4th of July, it makes no sense whatsoever to calculate the average DNL for the year by averaging the 4th in with other 364 other "quiet days." Those 364 days are not pertinent to understanding fireworks annoyance levels. It is the difference between the two that creates annoyance.

Because, the DNL relevant to evaluating jet noise annoyance can only be determined for days when the jets are flying, the use of the 365-day AAD averaging understates Growler FCLP noise annoyance and reduces the acreage within the 55 and 65 DNLs contours.

As explained by noise internationally prominent noise expert Sandy Fidell (Fidell Associates, Inc.)[3], "*DNL is, by definition, a 24 hour noise measure. Thus, DNL*

[3] President, Fidell Associates; positions held at Bolt Beranek and Newman and successor organizations: Director, Environmental Technologies Department; Manager, Environmental Research and Data Systems Department; Senior Manager; Lead Scientist; Senior Scientist; Manager, Los Angeles Computer Laboratory. [Note: BBN Technologies (originally Bolt, Beranek and Newman) is an American high-technology company that provides research and development services. Based in Cambridge, Massachusetts, it is a military contractor, primarily for DARPA, and also known for its 1978 acoustical analysis for the House Select Committee on the assassination of John F. Kennedy. BBN of the 1950s and 1960s has been referred to by two of its alumni as the "third university" of Cambridge, after MIT and

*contours are intended to represent the aircraft noise exposure during a hypothetical, but "typical" or otherwise representative day.*"

So, the 106 DOE use of the 365-day AAD artificially lowered the DNLs. As Fidell explains, "*averaging the exposure created on one night per month over a year is a pretty big stretch: 10·log(12/365) is about a 15 dB underestimate of exposure on nights when FCLP operations are conducted.* Note that +15 dB equates to being about 1.5 times louder, or a misrepresentation of 150%,

Correct use of busy-day averaging is affirmed in a 2013 noise study conducted by Wyle (the Navy's exclusive noise expert) for the Avon Park Air Force Range Complex.[4] Because flight operations occurred, on average, 260 days of the year, Wyle appropriately used busy day (ABD) averaging: "*For noise modeling, total annual flight operations were converted to Average Busy Day (ABD) flight operations by dividing annual flight operations by the number of airfield operating* [busy] *days in a year…*"

And still another study, this one for NAS Whidbey Island,[5] provided this proper application of ABD averaging.

> Noise contours for Naval air facilities are based on either the Annual Average Day or the Average Busy Day. The Navy document that addresses noise and land use compatibility around Naval facilities, OPNAVINST 11010.36A, Air Installation Compatible Use Zones

Harvard. In 1966, the Franklin Institute awarded the firm the Frank P. Brown Medal.BBN became a wholly owned subsidiary of Raytheon in 2009. On February 1, 2013, BBN Technologies was awarded the National Medal of Technology and Innovation.] . Fidell's Honors, Societies, and Advisory positions include: Acoustical Society of America (Fellow); Associate Editor, Journal of the Acoustical Society of America; U.S. Representative to International Standards Organization Technical Advisory Group on Community Response Questionnaire Standardization (ISO/TC43/SC1/WG49), and to ISO Working Group 45 on Community Response to Noise; Acoustical Society of America Representative to I-INCE Technical Study of "Metrics for Environmental Noise Assessment and Control"; Acoustical Society of America, Technical Committee; National Research Council Committee on Hearing, Bioacoustics and Biomechanics; Current or past member of the American National Standards Institute, Committee on Bioacoustics, Working Groups on Environmental Noise Measurement and Assessment and Auditory Magnitudes, and Community Response to Noise Levels; American Helicopter Society, Committee on Acoustics; IEEE Power Engineering Society, Audible Sound and Vibration Subcommittee; Design Review Group for FAA's Integrated Noise Model software; BBN Outstanding Publications Awards in1989, 1991, 1996.

[4] Revised FINAL Noise Study for the Avon Park Air Force Range, Florida. 2013. Wyle Report WR 13-05.

[5] Page 4-24 of the U.S. Navy's 1993 DEIS entitled "Management of Air Operations at Naval Air Station Whidbey Island." (Attributed to the Department of the Navy's Western Division Naval Facilities Engineering Command Engineering Field Activity Northwest for The Proposed Modification of Air Operations Management at Naval Air Station Whidbey).

> (AICUZ), states: Noise exposure contours will be developed using either the Annual Average Day, or Average Busy Day where analysis indicates that the Annual Average Day would not properly reflect the noise environment. For example, at air installations which are closed on weekends or where weekend operations are substantially less than weekday operations, the use of Average Busy Day is appropriate. Because public attitudes toward an intermittent noise environment are most probably related to the days with higher noise exposure, **noise contours for a "busy day" of flying activity would be expected to relate more closely to public attitudes than contours for average annual daily activity**. (emphasis added)

The 2005 AICUZ and related 2004 Wyle report for the NAS Whidbey Island likewise explain, "*For some military airbases, where operations are not necessarily consistent from day to day, a common practice* ***is to compute a 24-hour DNL or CNEL based on an average busy day, so that the calculated noise is not diluted by periods of low activity.***" (emphasis added)

Nevertheless, the 2016 NASWI draft EIS opted to use AAD with this rather strange explanation refuting its own 2005 AICUZ (pages 3-12 to 3-13); presumably this weak non-explanation applies to the 106 DOE use of AAD as well.

> The intent of this EIS is not to directly support the AICUZ program [which calls for ABD], but to use best available science as required under NEPA to develop an accurate analysis of potential noise impacts from the Proposed Action. Thus, while related, the AICUZ standard is not necessarily an appropriate NEPA standard. Using ABD would greatly overstate the nature of the noise impacts at OLF Coupeville, thus providing decision makers and the public with an inaccurate analysis.

Actually, just the opposite: The AAD method the Navy used is "*providing decision makers and the public with an [inaccurate] analysis*" because it "*greatly [understates] the nature f the noise impacts.*" The motive is fully apparent and inconsistent with NEPA, and it blatantly contradicts the assertion that the Navy uses only the best available science.

**(e) Misuse of the Decibel A-Scale.**—Growlers produce far more low-frequency noise (LFN) than their Prowler predecessor. The "Growler" name is a reflection of its LFN. The decibel A-scale (dBA), however, filters out LFN, and hence, use of dBA produces lower decibel readings for Growlers than would the C-scale (dBC).

LFN also travels further than higher frequencies because its attenuation rate is less. Hence, it is measurable at greater distances than are higher frequencies. And, noise contours for Growlers based on the A-scale will include less land mass than if the C-scale were used.

In addition, LFN travels through walls, and other relative hard surfaces because its reflection rate is far less than higher frequencies. Hence, LFN produces more noise-induced vibration, and that is problematic not only for structures but also for humans and wildlife exposed to LFN. According to Mireille Oud, a medical physicist, "*There is no shielding against LFN. Since LFN propagation is mainly structure-borne, closing doors and windows is not effective. Earplugs are of no use, because LFN bypasses the eardrum*." [6]

So here again, a metric seems to have been selected that does not objectively inform, but rather has been selected to distort and hide the real effects and impacts of noise generated by the Growler aircraft.

## 2. Impacts of Growler FCLPs on the Reserve

The impacts of Growler FCLPs on Ebey's Landing National Historical Reserve fall primarily into two categories: (1) effects on historic structures, and (2) effects on visitor experience.

**(a) Assessment of Growler FCLPs on Historic Structures.**—The 106 DOE asserts that, "*The DNL metric is the current standard for assessing potential effects to historic properties because it factors the number, frequency, and energy (loudness) of noise events. The DNL metric is a cumulative measure and represents long-term noise exposure rather than a sound level heard at any given time, which makes it appropriate for assessing long-term direct and indirect auditory, visual, and atmospheric effects to historic properties* (page 25)." The Navy contradicts

[6] Mireille Oud, Low---frequency Noise: a biophysical phenomenon, Presented at Congress "Noise, Vibrations, Air Quality, Field &Building", 6 November 2012, Nieuwegein, The Netherlands.

itself in making that assertion. As discussed below, the 106 DOE concludes that 130 dBC is the approximate threshold for vibrational noise damage. Hence, by selecting the A-scale DNL average as the metric to evaluate noise damage to buildings, there can be no damage because the DNL says nothing about how long or how often that 130 dB is approached or exceeded. That is, the DNL hides the damaging component of noise in the same way that the average New Orleans wind speed in 2005 provides no insight whatsoever about the damage caused by 150 mph winds of Hurricane Katrina.

Pressure is the damaging component of sound that can cause solid surfaces to vibrate. The greater the noise, especially LFN, the more intense the pressure and the greater the vibration. There are a number of other metrics that could be used that would quantify the amount of damaging noise exposure (e.g., sound equivalent level, maximum un-weighted Z-scale). So again, why has a misleading metric been used instead of an informative one?

Pages 59-61 of the 106 DOE, briefly discuss the only studies done on historical structures from jet (the supersonic Concord) noise, but there is no data or information to indicate what the dBC noise levels were at the buildings studied. Nor does the 106 DOE describe structural aspects of the historic buildings evaluated and how they may differ or be similar to the Reserve's structures. Absent that critical information, the two cited studies cannot be credibly related to the Reserve's structures and are of little value or pertinence.

The 106 DOE, however, goes on to reference a 2012 study at NAS Whidbey Island that *"suggested that sounds lasting more than 1 second above a sound level of 130 C-weighted decibels (dBC) are potentially damaging to structural components (Kester and Czech, 2012)," but that none of the conditions evaluated for the study caused C-weighted sound levels to exceed 130 dBC…[albeit] takeoff conditions had C-weighted sound levels greater than 110 dBC for both types of aircraft, creating an environment conducive to noise-induced vibration (Kester and Czech, 2012)."* This does not inform what the dBC levels were during takeoff but if they were *conducive to noise-induced vibration*, presumably they were at or near 130 dBC. Importantly, the type of Ault Field area structures examined in that 2012 study are not described to permit their comparison to historic structures on the Reserve. That is, were the structures contemporary to-code buildings or older

historic ones? We also noted that the Kester and Czech 2012 is not included in the literature cited section, i.e., is it a peer-reviewed publication in the formal literature? Nevertheless, the 106 DOE does seem to waffle on the applicability question:

> Because of a wide range of variations in building code and aircraft types, the U.S. has yet to develop a precise threshold for adverse effects to the integrity of buildings and structures. Therefore, this study [the 106 DOE] applies the same standards used in the 2012 noise study for the assessment of noise and vibration from Navy airfield operations to historic properties within the APE.

So, presumably the 130 dBC for >1 second is the Navy's accepted standard.

In 2016, the National Park Service (NPS) conducted a 31-day noise monitoring study at two historic buildings in the Reserve: the Reuble Farmstead [approximately under Path 32] and the Ferry House [further away]. The highest recorded sound pressure level was 113 dBA during FCLP activity over the Reuble Farmstead (note, that was the A-scale, not the C-scale, which will always be greater).

The NPS study evaluated the A-scale that affects human reactions, and not C-scale, which manifests the potential for vibrational damage. The 106 DOE, however, concluded that "*it is unlikely that sound pressures would approach a peak unweighted sound level greater than or equal to 130 dBC, which is the level that would be considered potentially damaging to structures at those locations*."

It may well be that 130 dBC is a realistic threshold for structural damage, or it could be less for ancient structures, but we are willing to accept that 1 second at ≥130 dBC is perhaps a general threshold to induce noise damage.

However, we reiterate that noise levels have to be measured on site. So why has the Navy strenuously resisted and on-site evaluations of Growler noise in spite of the fact they know that several credible published studies have shown modeled noise to significantly underestimate on-site monitoring.

Because the Navy provided no on-site monitoring, COER hired noise expert, JGL Acoustics, to examine noise under OLF path 32 in June 3013 and again in

February 2016[7]. Among other metrics, JGL recorded maximum un-weighted peak noise levels of 131 to 134 dB at five separate recording locations under the Path 32 flight path. Two of those stations were less than a mile from the Crocket Barn and the Reuble Farmstead.

NOTE: the maximum un-weighted noise levels JGL recorded equaled or exceeded Navy's 130 dBC threshold for noise damage.

As a result, the JGL findings, the only un-weighted peak levels recorded on site and on two separate occasions, strongly indicate a potential for vibrational damage to historic structures. The A-scale data for both the 2016 NPS sound study and the two JGL sets of recordings are quite similar, supporting the veracity of each.

So, whereas the 106 DOE concludes that it is "*unlikely that sound pressures [in the Reserve] would approach a* ***peak unweighted sound level*** *greater than or equal to 130 dBC,*" the information presented above shows that peak unweighted sound level is over 130 dB on nearly every fly-over. While the 106 DOE dismisses any likelihood of Growler damage to Reserve structures, the information here indicates the Navy's conclusion is not supported with reliable data. In contrast, mutually supportive on-site recordings (JGL and NPS) strongly indicate that structural damage is actually quite likely.

**(2) Effects on Visitors.**—The 106 DOE use of the 65 dB DNL to assess impacts on Reserve visitors is not acceptable because it white-washes and converts extremely loud noise into some sort of constant hum, a 65 dBA white noise that is always there. Of course Growler noise is not an ever-present ambient noise. Rather it is an extremely loud noise superposed on a very quiet ambient noise. And it is that horrific noise, the sudden dramatic increase in noise over the quiet solitude of the ambient level that upsets and disturbs and denigrates visitor experience. The DNL is worthless to assess that because it suffocates the Growler noise with the ambient quietness noise.

In addition, even if the DNL had some utility to assess visitor experience, which it does not, as discussed in section 2 (d) the scientifically now valid DNL threshold is 55 dB, not 65 dB, regardless of whether the Navy uses it or chooses, instead, to

[7] http://citizensofebeysreserve.com/Files/Lilly%20Report%202016.pdf

play games with science. Knowing the Navy prides itself on applying the most current and accepted scientific information, the 65-dB contours need to be revised to 55 dB, which will greatly increase the land mass and understanding of noise harassment impacts within the new contours.

Instead of the negligible application potential for DNLs to assess Growler noise impacts on Reserve visitors, one valid metric is a measure of how often and how long in a given year will Growlers be in the air over or near to the Reserve. Under the Navy's recently proclaimed preferred option for the OLF there are to be about 24,000 operations annually over the Reserve. If there were 100 days of carrier landing practice (busy days), there would be about 3 sessions per busy day (assumes 297 practice sessions/year[8] divided by 100 busy days). That amounts to about 120 min or 2 hours of noise each fly day, most of that (95%) occurring between noon and 10:00 PM. If practice was confined to 60 busy days, there would be about 5 sessions per fly-day (297 sessions/year divided by 60 busy days) amounting about 200 min or 3.3 hours of noise each fly day.

COER does not agree that 60 to 100 days of a Reserve visitor experience significantly impacted by Growler noise harassment is trivial or discountable. That, however, is what the 106 DOE implied from its "DNL analysis," albeit the Navy has admitted elsewhere to generic impacts, yet provided no real solutions.

On page 54, the 106 DOE argues that Growlers overhead do not impact the visual or atmospheric aspects of the District: *"[The] temporary introduction of a visual and atmospheric elements in the sky does not indirectly alter the characteristics of the district that make it eligible for listing in the NRHP*." The reasoning seems to be attended to the fact that there are ships and vehicles within sight. COER disagrees with that reasoning. The atmospheric conditions may be affected; at least no information was presented to indicate there are no impacts, and to conclude *no impact* is cavalier without substantiation. Ships produce very little noise and are miles distant, and hence, easily unnoticed or out of view, and an occasional vehicle in view or heard is hardly likely to induce much attention. Growlers, however, screaming out 130 dB at 600 feet over a visitor's head every 45 seconds are sure to degrade and divert and command the visitor's "*visual elements*," severely

[8] That is, 23,700 operations per year divided by 80 ops/session or 4 jets each conducting 20 operations (1 landing + 1 takeoff = 2 operations) or 10 circuits of the OLF.

interrupting and shifting visual attention and auditory escape from historic appreciation to a dramatic visual image of war.

Island County and Whidbey Island citizens have a long-term investment and commitment to the Reserve. The County's Comprehensive Plan has deemed the Reserve as a priority in the stated goals and policies. The intrusion of the Navy's Growler jet noise into the Reserve's soundscape has considerable impact on the County's ability to achieve the protection and pro-active preservation goals published in its Comprehensive Plan. The jet noise degrades and negatively impacts the rural character and the economically important heritage resources within our agricultural, recreation and tourism industries -- so important to the community and to the thousands of visitors who visit the Reserve annually.

## 3. Non-Validity of the OLF Historical Paradigm

The 106 DOE presents a lengthy historical operations explanation as well as charts depicting the FCLP activity at the OLF. The no-so-subtle suggestion is that the OLF history, which began as an emergency landing strip in WW II, gives it "*grandfather rights*" to continue to use the OLF as long as it sees fit and in a manner to be construed as somehow consistent with history. The inference is that since there has been a lot of noise in the past, continuation of that noise is grandfathered, and the community and the Reserve and its visitors will just have to make do.

Even if that right was reasonable—which it is not—how could one reasonably quantify the allowable historic noise rights? Should it be an average of annual noise across time since the Town of Coupeville's incorporation? Or perhaps from day the OLF opened in 1943? Should it maybe be from the start of Prowler FCLPs or maybe from the 2015 full Growler transition? There simply is no intuitive and logical starting point. Nor are yesterday's problems and abuses reason to continue them today and into tomorrow.

In that regard, it is interesting that the 106 DOE's historical analysis made no mention of the citizen group that formed in the 1990s to curtail the Prowler FCLPs

at the OLF. They reached a settlement of sorts; it did not last long unfortunately and is now almost forgotten. So, this is an old problem that has grown worse with time and a noisier jet creating multi-county distress even reaching into the Okanogan Valley. This is a massive encroachment of Navy noise over public and private properties.

The country is no longer uninformed or dismissive about detrimental noise. We understand the noise/health and safety risks: risks to fetuses of pregnant women, to school-age children's learning and hearing, and to a wide variety of health and life issues. And we know about the investment and economic drags, including how tourisms and park visitors react to noise. And we know how Growler noise drags and cripples the sanctity of our national-interest historic reserve, the first such in our country.

So, history is important, and it absolutely should transcend a misconceived and self-assigned military grandfather non-right. What is relevant is how to resolve the Growler FCLP impacts of today, not how we lived with Prowlers yesterday. We are no longer myopically conditioned to accept that the *Sound of Freedom* trumps thoughtful and penetrating analyses to realistically balance national security with needed and effective military training.