

The attached comments have been sent to the Navy:

November 15, 2016

**Comments on Draft Environmental Impact Statement  
EA-18G "Growler" Airfield Operations at NAS Whidbey**

We have reviewed the Draft EIS prepared by the Navy with great interest and offer the following comments from our perspective as a conservation biology laboratory located in and serving the San Juan Islands. Our comments are limited to our area of expertise, which is to say the nature and functioning of protected ecosystems and wildlife in San Juan County. As residents of the county, we also share many of the concerns expressed by our neighbors regarding human health and well-being.

**1. Definition of noise levels**

The Draft at 3-15 uses A-weighted noise levels as a basis for determining the geographical envelope of project impacts as well as the potential for harm. This weighting method is based on the sensitivity of human hearing in air. It is inaccurate to apply the same negative weighting factor to those animals that have greater sensitivity of hearing than humans. In terms of noise impacts on wildlife, then, the Draft underestimates effective levels of exposure.

**2. Determination of the impact envelope**

The contours on the area-of-impact maps (at 3-26 and subsequent) are based on "modeled aircraft noise levels" rather than measured levels. Models are not data; they are forecasts or predictions. In the present case, moreover, the model appears to have been based on flight path geometry, i.e. the nominal departure and approach trajectories of aircraft operating from Ault Field. These ideal paths are incomplete and inaccurate. Our core laboratory is located in Lopez village, and we observe low-elevation flights several days per week at 80 dB and greater, yet according to the Draft our lab is not on a flight path (at 3-8). We contend that the Navy's modeling of the area of impact is flawed, and that actual measurements must be the basis for determining levels of noise exposure.

A critical effect of the methodology used to predict the geographic area exposed to 65 dB or greater is the exclusion from consideration of the most important, sensitive federally protected wildlife areas in the San Juan Islands, viz. the SJI National Monument and SJI National Wildlife Refuge, which are used seasonally for nesting and foraging by tens of thousands of seabirds as well as seals, sea lions, orcas, porpoises, and minke whales.

**3. Exclusion of the SJI National Monument**

The Draft suggests that the lands and waters of the SJI National Monument are exempt from NEPA protection because the 2013 proclamation establishing this NCLS preserve states: "Nothing in this proclamation shall be deemed to restrict safe and efficient aircraft operations, including activities and exercises of the Armed Forces in the vicinity of the monument." Legally, this merely has the effect of preserving the status quo ante: that is to say, it clarifies that the creation of the National Monument

does not place any additional burden on the Navy to justify its operations in the vicinity. The President did not--indeed, he did not have the power to exempt the National Monument area from federal laws that already applied to wildlife there. Hence while the creation of the Monument did not per se give the seabirds and terrestrial animals there any greater protection from operation of military aircraft, neither did it exempt the Navy from NEPA or ESA with respect to wildlife in the Monument, such as Marbled Murrelets or marine mammals.

Insofar as the Draft excludes the National Monument as a matter of law (at 3-74 and subsequently) it is inadequate under NEPA and should be reconsidered. We note that the Draft concedes that the SJI National Monument is subjected to a maximum noise level of 95 dB an estimated 372 times per year (at 3-34), hence the exclusion of this conservation area from consideration of noise impacts is plainly non-trivial.

#### 4. Reliance on speculation rather than science

The Draft concedes that many protected marine and terrestrial animals within the operational area will be subjected to louder and more frequent noise, but dismisses the relevance of this conclusion by stating, repeatedly, that animals have "presumably habituated" to current aircraft noise, implying that animals will surely tolerate even greater noise levels (4-307, 4-308).

This is the pivotal scientific assertion in the Draft with regard to environmental impacts, and it is both speculative and illogical. No evidence of habituation by the species concerned is provided. Moreover, if something is capable of causing harm--whether it is a chemical compound, or a physical force such as sound pressure--greater exposure is likely to increase stress on organisms, and eventually exceed their ability to adapt. The proper scientific question is "How much noise can species X habituate to in these circumstances?" This is a question of fact that can only be determined by observation.

Hence the Draft is merely speculating (presuming) that species in the operational area have already adapted to existing levels of aircraft noise, i.e., they are no longer stressed or responding adversely to overflights. Having speculated that past aircraft operations have had no effect, the Draft asks the reader to assume that raising the noise level will have no impact either, which is nonsense.

Accordingly, we submit that the Draft underestimates the levels of noise and the geographical area that will be affected, and merely speculates that existing and future noise levels will not impact the protected species within the underestimated 65 dB envelope. This is not based on science and does not meet the review criteria of NEPA.

We may be contacted at [kwiaht@gmail.com](mailto:kwiaht@gmail.com) for clarification and additional information.

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