

Failing to Address the 40 Additional Growlers at NASWI in the Draft EIS

The Draft Environmental Impact Statement (EIS) is deficient in not addressing 40 Growlers now being delivered beyond the 35 or 36 identified in the Proposed Action. The Draft EIS states that

The Proposed Action would:

- continue and expand existing Growler operations at the Naval Air Station Whidbey Island complex, which includes field carrier landing practice by Growler aircraft that occurs at Ault Field and Outlying Landing Field Coupeville
- increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment

The Environmental Impact Statement evaluates the potential environmental impacts associated with the following resource areas: airspace, noise, safety, ... , *as well as the cumulative impacts of the Proposed Action and other local projects. [emphasis added]*¹

The Draft also states that the total number of Growler Aircraft at Ault Field will be 117 or 118.²

A Department of Defense (DoD) report from 2016 states

The procurement profile of the FY 2017 PB adds 7 EA-18G aircraft in FY 2016. The result of this addition will be a FY 2016 FRP contract for Lot 40 EA-18G aircraft, which increases the total Program of Record (PoR) from 150 to 157. ... These aircraft are in the process of delivery ...³

Initial aircrew training will be conducted at NAS Whidbey Island, WA. ... Limited I-Level for some EA-18G and F/A-18E/F common maintenance tasks has been established at Whidbey Island, WA. Airborne Electronic Attack (AEA) I-Level maintenance will be stood up at Whidbey Island and aboard the CVWs commencing FY18.⁴

It is clear from the DoD report that 157 Growlers will be based at NASWI at times, not 117 or 118 as described in the Draft EIS. The additional 40 Growlers are part of the same mission and are “in the process of delivery.”

The Draft does not acknowledge the additional 40 Growlers, describe what activity they will undertake or analyze how that activity will impact the affected environment. We have been verbally told that they are “only spares.” For example, will maintenance engine run-ups be conducted on the additional Growlers?

¹ Environmental Impact Statement for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex Volume 1, pg. Abstract-1

² *ibid*, Table 2.3-1

³ Selected Acquisition Report (SAR), RCS: DD-A&T(Q&A) 823-378, EA-18G Growler Aircraft (EA-18G), As of FY 2017 President’s Budget, March 17, 2016, pg. 7. <https://goo.gl/IQrY4K>

⁴ *ibid*, pg. 37

The Draft EIS has not fulfilled its obligation to “evaluate[s] the potential environmental impacts ... *as well as the cumulative impacts of the Proposed Action and other local projects.*” Council on Environmental Quality (CEQ) Regulation 1502.9 states

(c) Agencies: (1) Shall prepare supplements to either draft or final environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) *There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.*

RECOMMENDATION: Supplement the EIS to address the 40 additional Growlers to be stationed at NASWI and allow further opportunity for public comment before the Final EIS is prepared.