

Informational Booklet for the *Naval Air Station
Whidbey Island Complex Draft Amended
Analysis to the Environmental Impact Statement
for EA-18G "Growler" Airfield Operations at
Naval Air Station Whidbey Island Complex, WA,
September 2018*

April 2025 | www.nepa.navy.mil/growler

WELCOME

Welcome to the open house public meeting. The Navy invites you to provide comments on the *Draft Amended Analysis to the Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex, WA, September 2018*. As a result of litigation following the completion of the EIS in 2018 and the Record of Decision in 2019, the Navy has amended its prior greenhouse gas (GHG) emissions calculations and prior analyses of aircraft noise impacts on specific species of birds, and the impact of increased operations on childhood learning, consistent with the Court's findings, and reassessed whether relocating some or all of the Growler community to Naval Air Facility (NAF) El Centro is a reasonable alternative.

The comment period for the Draft Amended Analysis began when the Navy published a Notice of Availability in the Federal Register on March 14, 2025. The 45-day public comment period ends on April 28, 2025.

HOW TO COMMENT

Comments must be submitted by April 28, 2025, to be considered in the development of the Amended Analysis. Comments should describe specific issues or topics within the scope of the Draft Amended Analysis. The public may submit comments in one of the following ways:

- Electronically on the project website: www.nepa.navy.mil/growler
- In person at one of the open house public meetings
- By mail, postmarked no later than April 28, 2025

Mail comments to:
Naval Facilities Engineering Systems
Command Atlantic
Attention: Code EV21/JB
(EA-18G Project Manager)
6506 Hampton Blvd
Norfolk, VA 23508-1278

Please visit the project website at www.nepa.navy.mil/growler to review the *Draft Amended Analysis to the Environmental Impact Statement for EA-18G "Growler" Airfield Operations at NAS Whidbey Island Complex, WA, September 2018*.



INTRODUCTION

In 2018 and 2019, the Department of the Navy (Navy) published an Environmental Impact Statement (EIS) and Record of Decision (ROD) to augment the Navy's Airborne Electronic Attack community at NAS Whidbey Island with additional EA-18G "Growler" aircraft. As a result of subsequent litigation, the Navy is amending its prior greenhouse gas (GHG) emissions calculations, and prior analysis of species-specific impacts on birds, and the impact of increased operations on childhood learning, and reassessing the reasonableness of the Naval Air Facility (NAF) El Centro alternative.

Specifically, this Draft Amended Analysis:

- Discloses the basis for GHG emissions calculations and gives appropriate consideration to public comments on this issue;
- Clarifies and supplements the analysis of species-specific impacts on birds;
- Refines the analysis of the impact of increased operations on childhood learning and attempts to quantify the degree of impact to the extent supported by the best available science; and
- Reassesses whether relocating some or all of the Growler community to Naval Air Facility (NAF) El Centro is a reasonable alternative.



Project Background

In the 2018 Final EIS, the Navy evaluated environmental impacts associated with augmenting the Navy's existing Electronic Attack community at NAS Whidbey Island with additional Growler aircraft, increasing airfield operations and redistributing operations between NAS Whidbey Island's main airfield, Ault Field, and outlying landing field (OLF) Coupeville, establishing facilities and functions at Ault Field to support an expanded Growler mission, and associated personnel changes.

The Navy evaluated three alternatives in the 2018 Final EIS. As part of this process, the Navy identified an alternative, called Alternative 2A, as the preferred alternative. The preferred alternative would expand expeditionary and carrier capabilities by establishing two new expeditionary squadrons, adding two additional aircraft and additional squadron personnel to each of the nine existing carrier squadrons, augmenting the Fleet Replacement

Squadron (FRS) with eight additional aircraft and additional squadron personnel, and redistributing field carrier landing practice (FCLP) between Ault Field and NAS Whidbey Island's Outlying Landing Field (OLF) Coupeville, such that 80 percent of all projected FCLPs will be conducted at OLF Coupeville and 20 percent at Ault Field. In total, this alternative would result in a net increase of 36 aircraft, and an estimated increase of 628 Navy personnel and 860 dependents.

2018 FINAL EIS

Because the Draft Amended Analysis supplements the analyses conducted in the 2018 Final EIS, the Proposed Action, Purpose and Need for the action, and the alternative documented as the Navy's preferred choice in the 2018 Final EIS have not changed. To review the 2018 Final EIS for this project, please visit the project website:

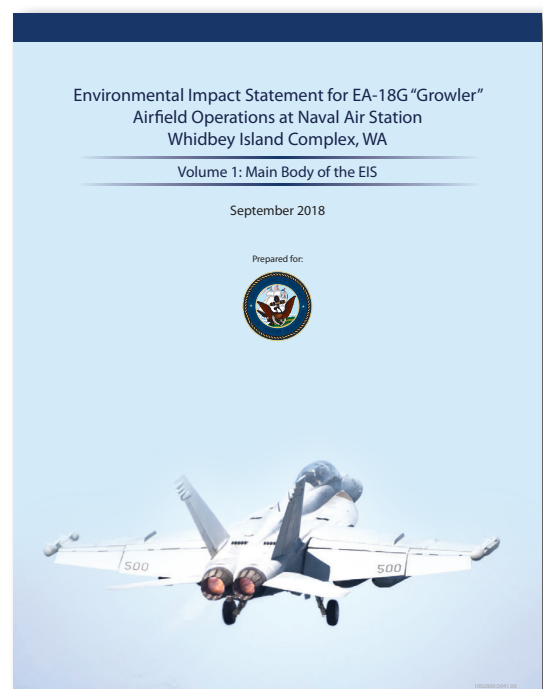
www.nepa.navy.mil/growler.

DEFINING SQUADRON TYPES:

Carrier squadrons deploy on aircraft carriers and conduct periodic field carrier landing practice, or FCLP, to requalify to land on aircraft carriers.

Expeditionary squadrons deploy to overseas land-based locations and therefore do not normally require FCLP prior to deployment.

Fleet Replacement Squadron (FRS) or a **training squadron** is responsible for "post-graduate" training of newly designated Navy pilots and Naval Flight Officers, including those returning to flight status after non-flying assignments or transitioning to a new aircraft for duty.



Proposed Action

The Navy proposes to:

- Continue and expand existing Growler operations at the Naval Air Station (NAS) Whidbey Island complex, which includes field carrier landing practice (FCLP) by Growler aircraft that occurs at Ault Field and Outlying Landing Field (OLF) 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
- Construct and renovate facilities at Ault Field to accommodate additional Growler aircraft
- Station additional personnel and their family members at the NAS Whidbey Island complex and in the surrounding community

In addition, the Navy would continue all flight operations of other aircraft at the NAS Whidbey Island complex.

Purpose and Need

The stated purpose and need of the Proposed Action as evaluated and analyzed in the 2018 EIS is as follows: *The purpose of the Proposed Action is to augment the Navy's existing Electronic Attack community at NAS Whidbey Island by operating additional Growler aircraft as appropriated by Congress. The Navy needs to effectively and efficiently increase electronic attack capabilities in order to counter increasingly sophisticated threats and provide more aircraft per squadron in order to give operational commanders more flexibility in addressing future threats and missions. The need for the Proposed Action is to maintain and expand Growler operational readiness to support national defense requirements under Title 10, United States Code, Section 8062.*

THE DRAFT AMENDED ANALYSIS

The Draft Amended Analysis revises and supplements the Navy's prior analysis of species-specific impacts of the Proposed Action on birds and the impact of increased operations on classroom learning, amends the Navy's prior GHG calculations, and reassesses the elimination of the NAF El Centro alternative from detailed consideration. As such, the Navy's full analysis of the impacts of the Proposed Action in the 2018 Final EIS provides the necessary context for this Draft Amended Analysis and is incorporated by reference.



More information about each of the four areas identified for additional analysis follows.

Greenhouse Gas Emissions from EA-18G "Growler" Operations

The Draft Amended Analysis updates the Navy's greenhouse gas (GHG) emissions calculations for the Proposed Action and explains the basis for those calculations. GHG emissions were calculated in the 2018 Final EIS for aircraft operations only below 3,000 feet above ground level (AGL) based on policy and practice at that time. This Draft Amended Analysis includes the calculation of GHG emissions below and above 3,000 feet AGL.

Findings from this Draft Amended Analysis indicate that Preferred Alternative 2A would result in an increase in EA-18G "Growler" GHG emissions annually.

The net increase from the Proposed Action would nominally increase local and regional GHG emissions and contribute to global GHG concentrations, but would not result in any meaningful adverse GHG impact on global scale.



Avian

The Draft Amended Analysis clarifies and expands on the analysis in the 2018 Final EIS of the potential impacts of the Proposed Action on birds and incorporates species-specific analyses focusing on four at-risk species: the American white pelican, sandhill crane, common loon, and tufted puffin. The Navy selected these bird species for further analysis because Washington State has classified these species as endangered, threatened, or sensitive and each has the potential to be present on or around Whidbey Island and within a 92 decibel (dB) sound exposure level (SEL) contour area.

This Draft Amended Analysis does not address bird species analyzed separately in the 2018 Final EIS in sections addressing Endangered Species Act-listed species and eagles protected under the Bald and Golden Eagle Protection Act.

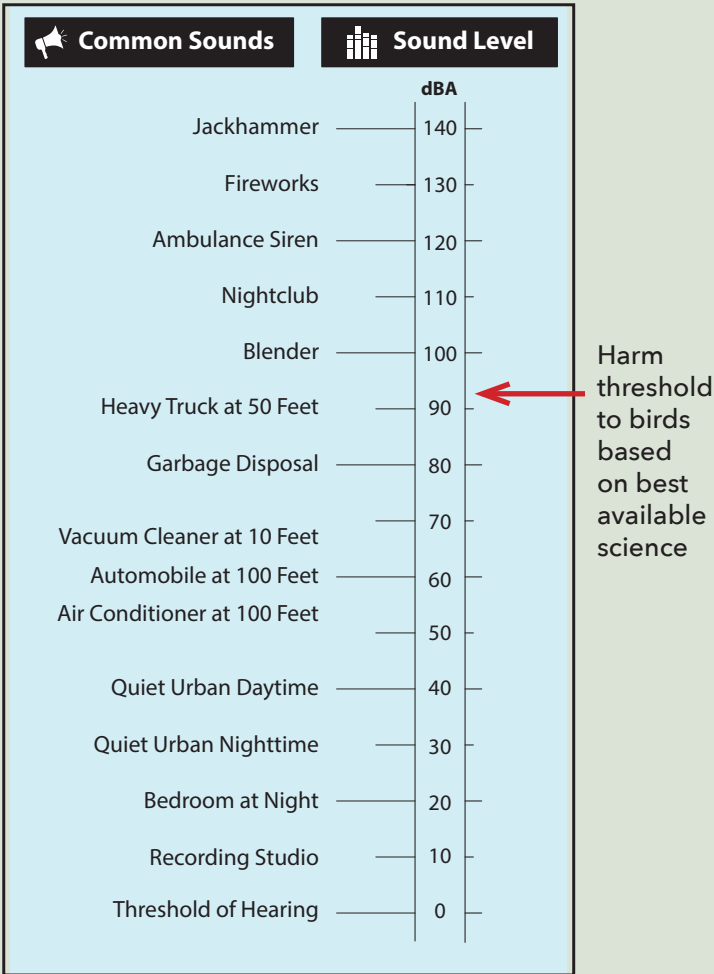
To assess potential Proposed Action impacts on the four state-listed bird species, the Navy evaluated the best available scientific information and used a harm threshold of 92 dBA SEL when evaluating the effects of noise on the four state-listed bird species. The noise level threshold of 92 dBA was considered sufficient for determining whether adverse impacts may occur to state-listed species in the absence of species-specific data. The Draft Amended Analysis Study Area and 92 dBA Noise Contour are depicted on page 9.



Quantifying Noise - what is dBA?

The decibel (dB) is a logarithmic scale used to represent sound level. Environmental noise measurements typically use an "A-weighted" scale, to approximate human hearing frequency sensitivity. The unit name used for an "A-weighted" decibel is dBA.

The graphic below shows common sounds and their sound level in dBA.

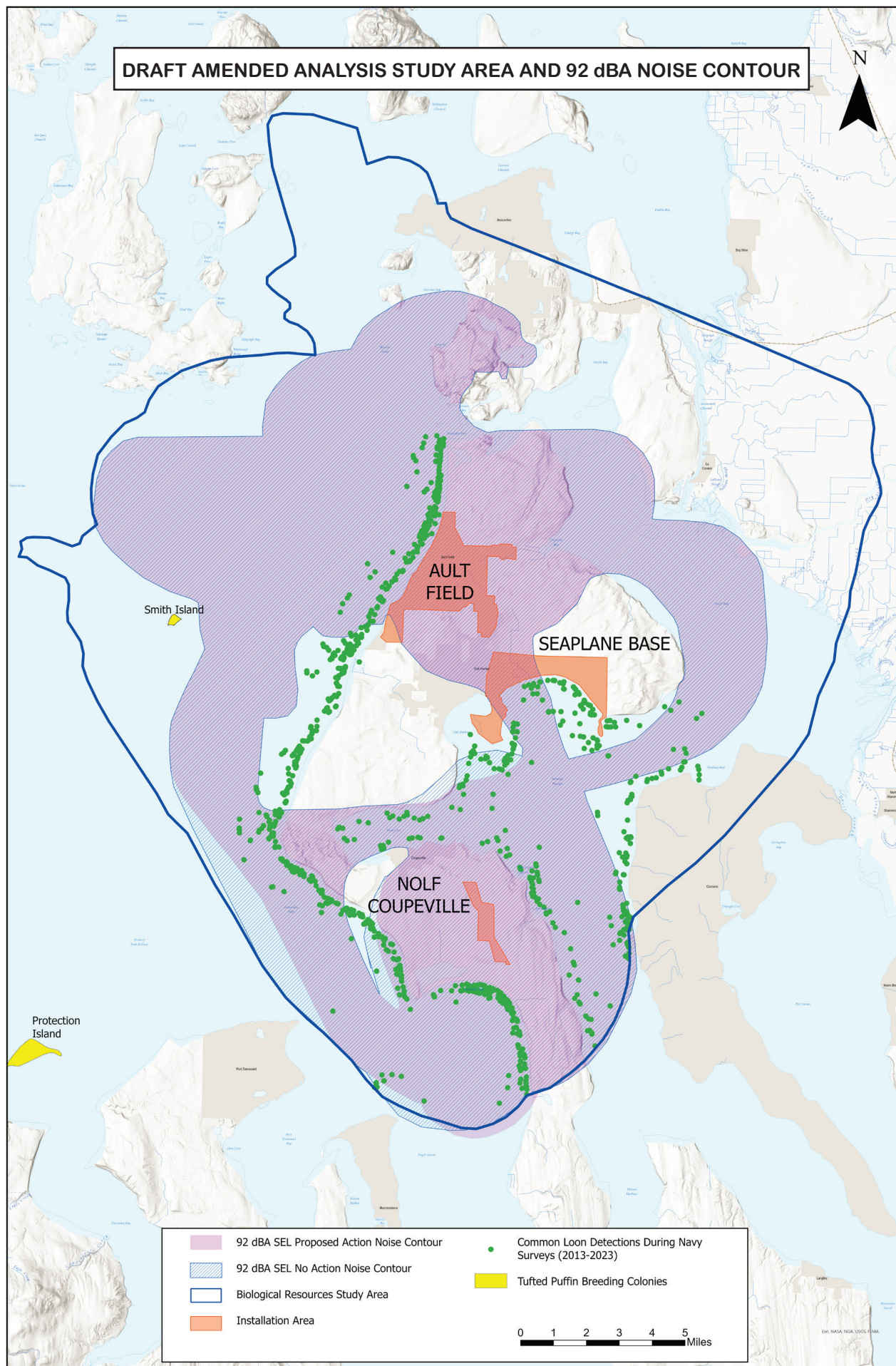


A-weighted Sound Levels from Typical Sources

Birds in the study area experience varying levels of exposure to noise from various human disturbances, including vehicular traffic, industrial equipment, construction work, and aircraft operations. Depending on the location on Whidbey Island, average day and night noise levels range from about 40-84 dBA. The 92 dBA SEL contour shown on the Draft Amended Analysis Study Area and 92 dBA Noise Contour map on the next page illustrates the area in which the disturbance at 92 dBA could cause harmful effects on bird species that are more than temporary.

It is important to note that Growler flight activity will not be continuous in any area but will instead occur periodically over each day and week. More Growler events occur during the daytime and fewer at night. Growler events typically occur during the work week between 7:00 a.m. to 10:00 p.m. FCLP operations are conducted in discrete "training evolutions" each lasting approximately 45 minutes and usually involving three to five aircraft conducting a series of touch-and-go events. Although there may be several training evolutions on a given day, no one location within the 92 dBA SEL contour would be exposed to elevated noise levels for more than 20-60 seconds at a time.

Accordingly, elevated noise exposure associated with the Proposed Action is intermittent and brief, not continuous, and separated by periods with no jet noise or exposure to noise levels lower than 92 dBA SEL. The Draft Amended Analysis includes details about



behavioral and psychological responses, and other sensory disturbances, caused by aircraft noise, and about the effects of noise on ecological patterns.

The following is a summary of the state-listed bird species evaluated in the Draft Amended Analysis. More details and references can be found in the Draft Amended Analysis.

American White Pelican - American white pelicans are uncommon summer visitors to the study area, particularly in or near the island's ponds/lakes/lagoons, including Crockett Lake which is located within the 92 dBA SEL contour and about 1.3 miles southwest of OLF Coupeville. American white pelicans present on Whidbey Island and within the 92 dBA SEL contour would potentially experience short-term stress or may flush in response to aircraft operations slightly more often compared to the No Action Alternative, but these behaviors are not anticipated to have any population-level effects, especially since the species does not breed within the study area.



American White Pelican (USFWS)



Sandhill Crane (USFWS)

Sandhill Crane - Sandhill cranes are rare migrant or winter visitors to Whidbey Island. The species has been recorded in open areas, typically near water such as Bos Lake (near Swantown) and Crockett Lake. Like the American white pelican, sandhill cranes on Whidbey Island are typically short-term visitors, stopping off for a few hours or a few days before continuing migration. Sandhill cranes present on Whidbey Island would potentially experience short-term stress or may flush more frequently in response to the increased aircraft operations relative to the No Action Alternative; however, these behaviors are not anticipated to have any population-level effects.

Common Loon - Common loons are the most frequently detected state-listed bird in the study area and the most likely to occur within the 92 dBA SEL contour. There is no research examining the impacts of aircraft disturbance on non-breeding loons; however, breeding loons are sensitive to visual disturbance from humans and will abandon their



Common Loon (USFWS)

nesting sites temporarily if approached or permanently if the nesting site or lake is no longer viable due to disturbance. Common loons do not breed in the survey area and, if present in the marine waters off Whidbey Island are typically foraging. Changes in foraging location or short-term stress associated with the noise disturbance are not anticipated to have population-level effects on common loons. Individual common loons have most likely been returning to the study area despite current Navy flight activities.

Tufted Puffin - Tufted puffins are the only state-listed species known to breed in the study area, on Smith Island, approximately 6 miles west of Ault Field. The nesting location is outside of the 92 dBA SEL contour as depicted on page 9. When disturbed, tufted puffins may dive underwater or flush from the source of disturbance and would likely exhibit short-term behavioral and physiological stress responses. However, aircraft overflights are brief in duration, and flights are not anticipated to occur

over most areas where breeding puffins forage. The exposure to noise associated with overflights may increase slightly relative to the No Action Alternative, but this increase is not anticipated to cause changes in short-term behavioral and physiological responses relative to the No Action Alternative. With only short-term effects, it is unlikely that the increase in noise will have population-level effects, as there are no anticipated impacts to survival or breeding.

Findings from this Draft Amended Analysis indicate that the Proposed Action is not likely to result in significant adverse effects on Washington State-listed species or their habitats. Stressors from the Proposed Action would be intermittent and would not disturb normal breeding, feeding, and nesting behaviors of individuals to a degree that would cause significant effects on their populations.



Tufted Puffin (USFWS)

Childhood Learning

The Draft Amended Analysis refines the analysis of the potential impacts of the Proposed Action on childhood learning and quantifies the degree of impact to the extent supported by the scientific literature.

Findings from the Draft Amended Analysis indicate that the Proposed Action may have potential impacts on childhood learning. Some children could experience a one-month delay in reading comprehension. However, the most impacted schools remain at or above the State performance average.

NAS Whidbey Island maintains open lines of communication with local schools to minimize impact on childhood learning. When alerted by school principals, the NAS Whidbey Island Air Operations Department monitors airfield operational schedules and attempts to mitigate potential operational impacts during key academic testing periods in schools by rescheduling flight times around testing days where possible. Additionally, the Office of Local Defense Community Cooperation (OLDCC) provides funding to install sound insulation as part of the Public Schools on Military Installations program. This program funds the construction, renovation, repair, or expansion of public schools located on military installations to address capacity or facility condition deficiencies. This funding is being used to install sound insulation in two facility replacement projects, Crescent Harbor

Elementary and HomeConnection / Hand-In-Hand Early Learning Center, which are scheduled to be completed in 2026. Also, in October 2024, NAS Whidbey Island gave critical support to Oak Harbor School District's grant application to OLDCC under the Community Noise Mitigation Program. The program is designed to fund the installation of noise mitigation in eligible facilities impacted by military fixed wing aviation noise. On December 9, 2024, following a competitive selection process, the Assistant Secretary of Defense for Energy, Installations, and Environment approved the selection of the Oak Harbor School District's proposal and invited the district to apply for the Community Noise Mitigation Program. While this invitation does not necessarily mean the grant will be awarded, it represents a major milestone in the grant application process. If approved, the grant would fund installation of noise attenuation measures in four school facilities within the school district, further reducing interior noise levels.



NAF El Centro Alternative

The Draft Amended Analysis reviews the Navy's rationale for eliminating the NAF El Centro home basing alternative from detailed study and further explains why the NAF El Centro alternative does not meet the purpose of and need for the Proposed Action and, therefore, does not merit detailed study.

In developing the range of reasonable alternatives (see Section 2.2 of the 2018 Final EIS), the Navy reviewed several important considerations relevant to the Navy's purpose and need and to the reasonableness of each alternative, in addition to considering public comments, including proposed alternative locations. Refer to the 2018 Final EIS for further discussion. These same considerations informed the Navy's reassessment of the reasonableness of the NAF El Centro alternative. Relocating all or any portion of the Airborne Electronic Attack (AEA) community to NAF El Centro would degrade the community's overall effectiveness and does not meet the purpose of and need for the Proposed Action. The NAF El Centro alternative jettisons the AEA community's nearly 50-year history and continual capital and infrastructure investments at NAS Whidbey Island, especially in view of infrastructure improvements in 2005 and 2008 to allow for the introduction of EA-18G "Growler" aircraft. The



NAF El Centro alternative also fails to effectively and efficiently augment the AEA community in support of mission requirements. This alternative is neither practical nor economically feasible and is contrary to the Navy's fiscal stewardship responsibilities to the American public. Additionally, this alternative does not minimize adverse environmental impacts or enhance the quality of the human environment. In fact, home basing the AEA community or any number of EA-18G "Growler" aircraft at NAF El Centro would have a greater impact to air quality in a region that is already in nonattainment or maintenance for multiple criteria pollutants. The Proposed Action also has the potential to affect a larger population under this alternative.

Furthermore, the NAF El Centro alternative is inconsistent with and contrary to Navy policy to maximize efficiency of operations by co-locating operational squadrons with support functions, training ranges, and airfields for squadron-level training, fails to maximize existing resources, and would result in unreasonable duplication of functions and infrastructure at significant cost and delay, while creating unnecessary inefficiencies and detrimentally affecting operational readiness. These and other operational impacts increase the risk to mission accomplishment. Finally, the NAF El Centro alternative would impose additional and unnecessary burdens on sailors and their families. Accordingly, the Navy has eliminated this alternative from detailed consideration and does not carry it forward.



NEXT STEPS

Following the 45-day public comment period, the Navy will consider all relevant comments and prepare a Final Amended Analysis to *Environmental Impact Statement (EIS) for Airfield Operations at Naval Air Station, Whidbey Island, Washington* dated September 2018.

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April 2025 | www.nepa.navy.mil/growler