

February 22, 2021



Lloyd J. Austin III, Secretary of Defense
1000 Defense Pentagon
Washington, DC 20301

Honorable Thomas Harker
Acting Secretary of the Navy
Office of the Secretary of the Navy
1000 Navy Pentagon
Washington, DC 20350-1000

Matthew L. Arny, Commanding Officer
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278-5000

Subject: Real-Time Noise Monitoring

Dear Mr. Secretary,

The Sound Defense Alliance (SDA) is a coalition of groups representing thousands of Washingtonians throughout northwest Washington. SDA is recognized as a champion for working toward a balance of military and civilian goals in northwest Washington. Our work is done in partnership with many organizations.

National Parks Conservation Association (NPCA) is a nonpartisan, nonprofit voice working to protect and enhance America's favorite places, our national parks. NPCA has nearly 1.4 million members and supporters nationwide, with more than 34,000 in Washington State.

While SDA and NPCA are pleased to see the Real-Time Noise Monitoring started as required in Section 325 of the FY2020 National Defense Authorization Act (NDAA) and as extended in Section 313 of the FY2021 NDAA, we are disappointed with the implementation. The December 1, 2020 letter from Karnig Ohannessian, Deputy Secretary of the Navy (Environment) to Chairman Adam Smith outlines the report as focused on proving the validity of the Navy's current noise modeling and potential changes. This is inadequate.

The March 8, 2016 letter from R. David Allnutt, Director Office of Environmental Review and Assessment, Environmental Protection Agency on the Navy EIS states "The EPA believes this on-the-ground validation would help provide an assessment of actual noise impacts projected to be experienced by Whidbey Island and surrounding area residents and wildlife due to the proposed expansion."

When the NDAA was approved in December, 2020 Senator Maria Cantwell stated, "Noise from Growler training has caused much concern in local communities. Publicly available real time monitoring of Whidbey Island and Olympic National Park will provide transparency and a basis for an accurate discussion on the impacts of the increased flight activity between the Navy, the state and communities involved. I'm pleased to see this provision included in the final defense package." Representative Rick Larsen, in a statement to the (Everett) Herald, said it will "ensure air crews can get vital training while better understanding and reducing the impact of operations on surrounding communities."

SDA and NPCA consistently advocated that the primary objective of the study is to provide data to better

understand the impacts of Navy jet activity on people and the environment in addition to improving the computer models. On April 2, 2020 SDA and NPCA sent a letter to Deputy Secretary Ohannessian requesting that the Navy work closely with the National Park Service (NPS) Natural Sounds Division. They are internationally recognized experts in measurement of sound and noise, have specific experience with monitoring at Ebey's Landing National Historical Reserve and the Olympic National Park, and are named as conferees in the NDAA. The noise monitoring standards and metrics underway are based on ANSI standard 12.9 Part 2 and are a bare minimum. They are not consistent with NPS protocols and metrics *and are inadequate for this study*.

The December 23, 2020 press release from Michael Welding CIV USN states "The information will be available to the public *once the year long monitoring effort is complete and the Navy has submitted the final report.*" (*emphasis added*). This is not consistent with Section 325 (d) of the FY2020 NDAA on Public Availability of Results. Communications from the Navy related to this study indicates no commitment to share the actual monitoring data in a way that would allow independent analysis, nor timely release of the data. If the Navy waits to share information until after the report to Congress it is impossible for interested parties to provide timely and thoughtful comments. Given the investment of taxpayer dollars being spent on this effort we are deeply concerned by the lack of transparency and fidelity to the intention of the legislative requirements.

We request the following actions:

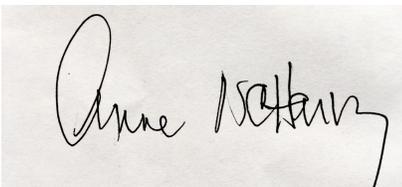
- Utilize the protocols and analysis conducted by the National Park Service at Ebey's Landing National Historical Reserve in 2016.
- Notify SDA and NPCA before each week when monitoring is scheduled, with the general locales, so that we can confirm low-med-high activity and/or conduct parallel monitoring.
- After each monitoring session the Navy needs to include information about the corresponding flight activity (exact times of day of flight activity, number of aircraft operating, and flight paths). This information needs to be provided along with release of the noise monitoring data.
- All data collected should be released 30 days after each monitoring session so that interested parties can review progress and develop analysis in a timely manner. Provide corresponding aircraft flight data and audio recordings so that the data can be analyzed.
- A draft of the report should be made public for a 3-week review period to provide feedback to the Navy before the report is delivered to Congress.

Lucian Niemeyer, Acting Assistant Secretary of the Navy for Energy, Installations and Environment stated in a post on March 27, 2020 "We want to make sure our noise monitoring effort is *comprehensive* and that the data collected meets the intent of Congress *and addresses local concerns.*" (*emphasis added*). Our previous requests to be involved as partners and collaborators in this effort have been denied, as have requests to allow SDA and NPCA sound experts to review and discuss the details of the study.

We are concerned that this expensive taxpayer funded effort is being implemented in a way that is narrowly focused on verifying the Navy's modeling, and will be neither comprehensive nor address local concerns.

We urge you to implement the action items above to meet the intent of Congress. Thank you.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read "Anne Harvey".

Anne Harvey, Chair
Sound Defense Alliance, anh Harvey13@gmail.com, (206) 850-4764



Rob Smith, Northwest Regional Director
National Parks Conservation Association, rsmith@npca.org; 206-903-1125

cc: Todd L. Schafer, Acting Assistant Secretary of the Navy (Energy, Installations and Environment)
cc: Governor Inslee
cc: Senator Cantwell
cc: Senator Murray
cc: Senator Inhofe
cc: Senator Reed
cc: Senator Shelby
cc: Representative Kilmer
cc: Representative Larsen
cc: Representative Adam Smith
cc: Representative William M. "Mac" Thornberry
cc: Representative Visclosky