



April 2, 2020

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Deputy Assistant Secretary of the Navy  
1000 Navy Pentagon, Room 4A674  
Washington, D.C. 20350

Dear Deputy Assistant Secretary of the Navy,

The Sound Defense Alliance (SDA) is a coalition of groups throughout northwest Washington and the Salish Sea representing thousands of Washingtonians. SDA has become a recognized advocacy group working toward a balance of military and civilian goals in northwest Washington. Our success depends upon collaborations and partnerships with many other organizations throughout Washington.

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.

SDA and NPCA appreciate the proactive steps by the Navy to prepare for the Real-Time Noise Monitoring included in Section 325 of the FY2020 National Defense Authorization Act (NDAA).

We are responding to the March Report on the Real-Time Aircraft Noise Monitoring Plan for two Navy installations on the west coast of the United States, and your accompanying letter of March 19<sup>th</sup>.

SDA, NPCA, and our member and partner groups throughout the region have been actively involved in advocating for the Congressional legislation requesting Real Time Noise Monitoring. We, along with our Congressional representatives, believe that there is an important role for public input and we have an interest in participating in the process to establish protocols for the 'Study' approved in the FY2020 NDAA.

In light of SDA's and NPCA's extensive involvement in the legislation, we respectfully request that:

1. SDA and NPCA be collaborating partners in assisting the Navy in developing a "statement of work", which is a detailed description of both content and process for how to conduct this 'Study'. Our participation will provide public access to the process that will yield credibility and alignment with the intent of the legislative directive. SDA and NPCA sound experts have been engaged in this issue for many years and can bring that historical knowledge and experience to the planning table.
2. SDA and NPCA sound experts request a call with the Navy staff and/or contractor, federal elected officials designees, and local elected officials to discuss the plan in detail before it is finalized. Our acoustics experts are positioned well to be collaborating partners for developing and overseeing the Real Time Noise Monitoring plan.
3. We request, also, that the Navy work closely with the National Park Service (NPS) Natural Sounds Division and that they be among the acoustics experts to develop a "statement of work" for this 'Study'. They have expertise with sound measurements at Ebey's Landing National Historical Reserve and Olympic National Park. Additionally, Senator Cantwell's press release from 12-10-19 about the legislation says "*It also requires the Secretary of Defense to work with the Director of the National Park Service and the Chief of the*

*Forest Service to come up with a plan within six months for real-time noise monitoring above or adjacent to nearby public lands, including Olympic National Park, Olympic National Forest, and Ebey's Landing National Historical Reserve."*

4. SDA and NPCA also ask that, due to the potential for altering planned Naval operations over the coming months to address concerns around the COVID-19 virus, the timing of monitoring should be set for times when Growler training is fully operational.

In response to your offer to consult with local communities and other federal agencies to place the Sound Level Meters (SLM) in locations of interest/concern to the community we offer the following comments:

- SDA and NPCA can assist in improving and expanding public process opportunities.
- SDA and NPCA support the Navy's plan to "place at least 10 SLM at pre-determined locations 'along and in the vicinity of flight paths.'" **Selection and agreement of monitoring sites is a priority for SDA and NPCA.** Representative Adam Smith stated "The Navy will consult with local communities and other federal agencies to place the SLMs in locations of interest/concern to the community." It's important to obtain reliable data from as many sites as possible rather than an abundance of data from a small number of sites. *For example: If 10 SLMs are available for 1 week for each season of the year, that equates to 40 7-day periods of recording time. Rather than sample 10 sites over 1 week in each season, SDA suggests that the seasonal variation may be less significant than getting a statistically reasonable amount of recording data from as many sites as possible, providing more data. See SDA Attachment 1 for site location recommendations.*
- SDA and NPCA view the noise monitoring standards in ANSI 12.9 Part 2 as a minimum. We strongly recommend that the Navy utilize the protocols and analysis conducted by the National Park Service at Ebey's Landing National Historical Reserve in 2016. The NPS and Navy agreed in advance of that study that additional acoustic information, collected at the Reserve, would be beneficial. **See Attachment 2 for raw data collection and analysis.**
- A fixed 7-day monitoring period may not achieve the desired accurate analysis intended. A fixed monitoring period may miss the impacts on people and the environment during heavy flight activity occurring at another time. Growler training activity varies: In 2019, Noise Reports in San Juan County shows periods of up to two weeks with little or no reported events.<sup>1</sup> We recommend that monitoring periods be extended until at least four (4) 45 minute intervals of FCLP training are captured. This could be based on the FCLP training schedule and represent the low-med-high in terms of numbers of FCLP sessions per day.
- Noise monitoring should be a blind test, meaning that the aircrews do not know when or where testing is going to take place.
- To comply with Section 325 (d) of the FY20, SDA recommends that **all** data collected shall be made available on a website accessible to any interested party, at no cost, for at least one year after the report is made to Congress and by request thereafter. A Data Dictionary and a contact for assistance in downloading the data should be provided. Collected data should be made available 30 days after each monitoring session.

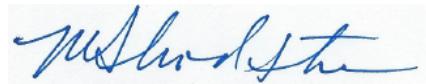
According to Lucian Niemeyer, Acting Assistant Secretary of the Navy for Energy, Installations and Environment "*We want to make sure our noise monitoring effort is comprehensive and that the data collected meets the intent of Congress and addresses local concerns.*" We encourage the Navy to include SDA and NPCA sound experts as partners in order to represent impacted communities to discuss the details of this Study. Thank you.

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<sup>1</sup> See pg 6, [https://f4be68e4-2f42-4ce8-b4c0-6fb1e95c8ac6.filesusr.com/ugd/f9226a\\_dd740961314749969ac1cd59f2877e81.pdf](https://f4be68e4-2f42-4ce8-b4c0-6fb1e95c8ac6.filesusr.com/ugd/f9226a_dd740961314749969ac1cd59f2877e81.pdf)

Sincerely,

Mark Lundsten, Chairman



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Rob Smith, Northwest Regional Director



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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