EA-18G Project Manager
Naval Facilities Engineering Command Atlantic
Attn: Code EV21/SS
6506 Hampton Blvd
Norfolk, VA 23508

February 22, 2017

RE: Draft Environmental Impact Statement for increased EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island.

Dear EA-18G Project Manager,

Thank you for the opportunity to comment on the draft Environmental Impact Statement (DEIS) regarding increased Growler operations at OLF Coupeville. The Town’s comments are conveyed along with our sincere appreciation for the mission of Navy Air Station Whidbey Island (NASWI) and our respect for the dedicated service men and women who work and train every day to protect our country. We acknowledge achieving preparedness for duty comes with consequences we all must share—and we expect to continue to share—and the importance of Outlying Field Coupeville (OLF) in the training of flight crews. It is not our desire to close OLF Coupeville. At the same time, however, we must speak for the residents, property owners, and businesses of Coupeville whose lives, investments, and incomes may be significantly affected by the outcome of this process. For our constituents, as well as for the validity of the process, our comments are offered in the spirit of promoting a rigorous environmental analysis and an informed decision that takes reasonable consideration of local impacts.

That said, we are very concerned by language in the DEIS that suggests a policy decision on where such consequences will fall has already been made, and that much of the extensive environmental work is intended to provide justification for the formal decision. As a community whose quality of life and economy appear to be under threat, we aspire to have faith in the system established to provide a full accounting of the impacts. We also hope that the analysis will allow a conclusion that one community not receive most of the advantages while another is disproportionately burdened with the negative effects. Based on a sincere desire to balance the operational needs of Naval Air Station Whidbey Island (NASWI) with the quality of life needs of our local residents who have called Coupeville home for generations, we respectfully submit the following comments on the DEIS for the EA-18G “Growler” Airfield Operations at NASWI for your careful consideration.
Island Communities of Oak Harbor and Coupeville

Oak Harbor has been home to NASWI and Ault Field since the base was built in 1942. Although its residents bear the negative impacts of the majority of NASWI flight operations, Oak Harbor also enjoys the lion’s share of economic benefits of being home to a large number of military personnel and civilian support staff. Such benefits include jobs, school funding, sales tax, real estate value, large-scale retail, and public amenities built by, and for, their military families as well as their residents. The economy and culture of Oak Harbor has been and continues to be significantly linked to the presence of Ault Field.

Coupeville and central Whidbey’s economy, history, environment, and culture are different. Together with the military families who choose to live in and around Coupeville, we are a community of fifth generation farmers, active retirees, and many families who have been here for several generations and are happy to be raising their children here. Our economy is heavily dependent on tourism and small-farm agriculture. Our historic commercial district includes retail, arts, restaurants, and lodging. As the second oldest town in Washington State, we promote our maritime and agricultural history, our historic buildings, the shoreline, outdoor recreation, and our place at the heart of Ebey’s Landing National Historical Reserve. We depend on pristine Penn Cove and the open fields, forests, and waterfront when promoting event venues, outdoor cultural activities, vacations, and local cuisine. The whole of central Whidbey contributes to both our residents’ quality of life and our visitors’ experiences.

The residents and businesses in the Town and central Whidbey Island overall have endured and proudly accepted a wide range of aircraft equipment and an inconsistent number of flight operations at OLF for the past 70 years. As indicated on DEIS Page 1-6, for almost 20 years—evidently since delivery of the last Prowler—flight operations have generally stayed similar to the level experienced today (6,200). For a generation, financial and locational decisions by residents and businesses have been based on the expectation that this level of impact will continue but not increase. A 250 percent to almost 500 percent increase to the number of currently approved Growler operations is inconsistent with and clearly adverse to everything we have worked for in Coupeville and central Whidbey. It is incompatible with our economy, history, and culture.

Ebey’s Landing National Historical Reserve

Ebey’s Landing National Historical Reserve was created by Congress in 1978 as the first reserve of its kind in the nation. The purpose of the Reserve is to “preserve and protect a rural community which provides an unbroken historical record from nineteenth century exploration and settlement in Puget Sound to the present time.” The Town of Coupeville, Island County, State Parks and the National Park Service have all worked together to assure growth and land use in the Reserve is appropriate and deliberate. Individual land owners, especially our pioneer farming families, have demonstrated their commitment to preservation and protection by selling their development rights to ensure the agricultural land is protected for farming for generations to come. The State of Washington recognized Town of Coupeville’s commitment to preserving a landscape and cultural fabric by granting an exclusive exemption to mandated urban growth under the Growth Management Act. We now find it sadly ironic that the characteristics we have worked so hard to protect and preserve (farm land, forests, shoreline, low density residential development and small populations) are the very same characteristics being used to justify increased flight operations at OLF Coupeville.
Cumulative Siting Actions
We are concerned about the Department of Defense’s (DOD) decision to site all EA-18G Growlers at NASWI, and how this decision has been made. It is not clear whether all of the steps had the benefit of environmental review and the attendant public process. Continuing today, this apparent ramp-up is unveiled in increments that don’t seem to convey a complete and transparent plan for NASWI. In 2006 the Growlers were introduced to NASWI. However, the Navy contended there would be no impact because they were replacing 82 Prowlers with 57 Growlers. A 2010 EIS reaffirmed the level at 57 Growlers. In 2012, that number was raised back up to 82 Growlers. During the 2013 scoping process for this EIS, when we were being asked to consider the alternatives for adding between 18 and 35 new Growlers, DOD made the decision to single-site all Growlers at NASWI, and we were informed that 35-36 new jets would be stationed here. Now, as the decision of the number of jets and the number of operations needed to support this level of inventory has already been made, we are given three alternatives whose main focus is the split of FCLP operations between OLF Coupeville and Ault Field. As we try to work our way through this seemingly predestined decision, we discover the DOD has already ordered 42 additional Growlers for a total of 160. We do not second-guess Congress’s and the DOD’s decisions on materiel allocations necessary for the Navy’s mission. However, we are concerned that, as soon as the Navy gets through this EIS process, additional jets and new squadrons may be brought online.

General Comments
1. Sections 1.3 and 1.4 of the DEIS provides detailed information in support of the Navy’s need to increase the electronic attack capabilities and provide more aircraft per squadron to enable the Navy to meet Title 10, USC Section 5062. However, the purpose statement makes the project a self-fulfilling action (the purpose is to take the action at NASWI specifically, rather than to generically take the action, with NASWI being found through an alternatives analysis to be the most effective and efficient location). The Final Environmental Impact Statement (FEIS) should remove “NAS Whidbey Island” from the purpose statement.

2. Section 2.2 identifies the approach used to develop the range of prudent and feasible alternatives considered in the EIS process. Page 2-2 identifies the key considerations that framed the consideration of alternatives. Such considerations effectively serve as screening criteria for the development and consideration of alternatives. The first consideration states, “The NAS Whidbey Island complex is home to the Navy’s Growler mission, including the training squadron, all U.S.-based squadrons, and substantial infrastructure and training ranges that have been established during the past 40-plus years and as supported by previous NEPA analysis regarding Growler operations.” This consideration, combined with the purpose statement, could be viewed as prejudicial and self-fulfilling as drafted, as it ensures that all prudent and feasible alternatives are associated with NAS Whidbey Island. The need statement addressed above does not require the need to be satisfied at NAS Whidbey Island but the purpose statement drives the alternatives to NAS Whidbey Island. In the FEIS, the first screening criterion on Page 2-2 of the DEIS should be removed from the text and from consideration.
3. Three factors required in the formulation of the alternatives are inadequately addressed in the DEIS and should be corrected in the FEIS, including: a) the description of the criteria for selecting alternatives, b) sufficient details in describing alternatives, and c) the identification of mitigation measures either within alternatives or in addition to them.

4. While a few alternative sites are described as unsuitable on pages 2-15 to 2-19 in response to comments, there is no systematic demonstration that all Naval Air Stations or installations on the west coast and Alaska, or elsewhere in the US, were evaluated according to the criteria in Section 2.2. The semi-qualitative statements on the referenced pages identify some of the criteria such as mean sea level but often address other factors not listed in the criteria, such as costs. There is no comparative chart against the criteria in the DEIS nor a comparison of other implicit criteria on pages 2-15 to 2-19, such as the costs of the proposed alternatives at the Whidbey NAS in relation to costs of relocation elsewhere. For example, are there other sites that meet a majority of criteria except for one or two – and could those criteria that are unmet be addressed reasonably since NEPA indicates the Navy should “[r]igorously explore and objectively evaluate the environmental impacts of all reasonable alternatives, particularly those that might enhance environmental quality or avoid some or all adverse environmental effects” including those “not within the existing authority of the agency”? The Town requests that the FEIS show its work in comparing other sites to the criteria in Section 2.2 in the subsection “Alternatives Considered but Not Carried Forward for Further Analysis.”

5. The DEIS appears to state that OLF Coupeville is the most physically suitable for the Field Carrier Landing Practice (FCLP) operations (Page 2-6), but because of potential noise impacts to the community the Navy chose to study up to 80% of FCLP operations maximum at OLF Coupeville. Apart from describing that 100% was desired but less is being studied, there is no discussion of why 80%, 50%, and 20% were selected as scenario thresholds. The DEIS seems to be implicitly identifying that their preferred alternative would be Scenario A, a 449 to 475 percent increase in operations at OLF, without stating such. Additionally, the Navy is not committing to a particular split, and operations may fall within that range. The FEIS should clarify the text regarding the rationale for the percentage splits in FCLP operations.

6. Several statements in the DEIS indicate that alternatives would return airfield operation levels to levels observed between the 1970s and 1990s per the graph on Page 1-6. This may be true for FCLP levels in total between Ault Field and OLF Coupeville, but considering OLF Coupeville alone, Scenario A, under all three scenarios, appears to exceed the maximum years on record for FCLP operations, Scenario B appears to exceed all ten years of the past 40, and Scenario C is more similar to, but in excess of, annual FCLPs over the last 20 years. The relevance of circumstances of past decades relative to the existing condition and whether such operational increases were subject to prior NEPA review should be clarified in the FEIS. The FEIS should clearly identify the magnitude of the change of operations at OLF in relation to today’s condition in order to create an accurate understanding of impacts and needed mitigation.
7. The DEIS discusses increasing FCLPs during a “high tempo FCLP year.” The term is only generally defined. To allow stakeholders to better understand its implications, “high tempo FCLP year” should be defined in terms of how often it may occur and under what circumstances. If a high tempo year can be declared to be operationally necessary in consecutive years or on an ongoing basis, the flight operation assumptions in Scenarios A, B, and C are essentially meaningless.

Housing
1. The Town understands that NAS Whidbey Island has recently finished an updated housing survey and that a new housing report is anticipated to be issued within the next several months. According to the data cited on page 4-232, the DEIS housing analysis is evidently based, at least in part, on outdated information. The FEIS housing section should incorporate the more current data that will be available in the updated housing study and should clarify the assumptions used in the analysis, including the forecast conditions in 2021.

2. The FEIS should correct the housing analysis to identify the impacts without the supply of Navy housing, since the DEIS states that new personnel will live in non-Navy housing.

3. The analysis should identify how the new personnel and dependents’ housing needs, incomes, and housing allowances would match the forecast housing supply and costs, with rental and ownership housing disaggregated.

4. The DEIS appears to consider all units within the study area as equal in meeting the demand, irrespective of distance and travel time from Ault Field. The FEIS should address the basis of the assumptions in the 2015 Study (or its successor) and match unit supply to expected locations.

5. The FEIS should provide an accurate accounting of the stock of adequate units forecast for the target year, with consideration of the effect of rental units committed to seasonal rentals and the potential change in the supply of housing units due to changes in noise contours.

6. The FEIS should evaluate the potential impacts of the alternatives on rental costs and property values in the study area from the standpoint of increased demand. Page 4-232 states, “... if recent real estate market trends continue and fewer housing units are offered for sale or lease, Navy personnel may find it more difficult to acquire or lease housing.” Similarly, existing residents, particularly those at the lower end of the economic spectrum, may find it difficult to find housing with the influx of personnel and dependents in the Action Alternatives. The analysis should address potential for displacement and affordability impacts to existing residents in the study area due to competition for rental units in the private market and the housing market’s response to increased demand. The analysis should be based on updated current and forecast conditions and the assumption that 77 percent of new NASWI households (DEIS Page 4-229) will reside in Island County.

7. With a revised analysis containing the elements described above, the conclusion of no impact should be re-evaluated and a discussion of reasonable mitigation measures provided, as applicable.
8. Current housing capacity and other baseline information was not available during the comment period for the DEIS. Per Environmental Readiness Program Manual, Page 10-63 and 10-64, section (2)(a)(1), the Navy is required to ensure there is sufficient information and baseline data to support the conclusions reached. The Town requests a 60-day comment period following issuance of the FEIS to evaluate the information on which the conclusions of the DEIS are based. The ability to ascertain that the supply of housing available to Navy personnel is currently adequate and will remain so in the future is crucial to the conclusion that there is no impact.

**Noise**

1. The results of the noise analysis should be presented in the FEIS by political jurisdiction, rather than aggregated, to make them more meaningful to stakeholders.

2. The noise contour maps in the DEIS are impossible to read and interpret at their printed scale in the document. For legibility, contour maps in the FEIS should be prepared following the presentation style adopted by the Federal Aviation Administration for noise exposure maps.

3. Figure 3.1-4, *Interfacility and FCLP Flight Tracks*, appears to show a flight route to enter the OLF pattern that crosses over or near the northeast portion of the town. This appears to be represented in the noise contours in Figure 3.2-5, No Action Environment for OLF Coupeville, but is not shown on the noise contour figures for the Action Alternatives. The Town is quite aware of noise complaints from property owners under this approach path. An explanation of the operational changes resulting in the distinctions between the No Action and Action Alternative noise contour maps, apart from those changes based entirely on the volume of operations, would be valuable for stakeholders in understanding the changes proposed under the Action Alternatives.

4. In the supplemental noise analysis in the DEIS, action-related noise effects were evaluated at only one noise sensitive use or area in the Town, the elementary school (S03). The Town requests that the FEIS include the high school/middle school as a point of interest and other points of interest on the north side of HWY 20, including the hospital, the Town Green, the NE Pennington Loop neighborhood, and the NE Burnham Place neighborhood.

5. Substitution of year 2021 conditions for existing conditions in the Affected Environment Chapter does not allow a clear identification of how conditions would change in the future with or without the proposed action. Rather, the use of the 2021 scenario is more appropriate to the cumulative impact discussion and the Future No Action. Since the 2021 condition has been approved in a prior NEPA document, it is reasonable to assume the Future No Action for purposes of identifying action-related effects. Its use as the existing condition in the Affected Environment is not appropriate unless the full transition has occurred five years ahead of schedule. The FEIS should provide a description of the true existing conditions or clarify how this 2021 condition evaluated in a prior NEPA decision document differs from actual current year conditions.
6. Section 4.2.1 Noise, No Action Alternative, states, "Under the No Action Alternative, the Proposed Action would not occur, and the Navy would not operate additional Growler aircraft (see Section 2.4.2.4) [sic]. Consequently, implementing the No Action Alternative, or taking no action, means the annual Growler airfield operations would be consistent with levels identified in the 2005 and 2012 transition Environmental Assessments (EAs). The transition of the P-3 to the P-8A aircraft would still take place as it is a separate, ongoing action. Therefore, the DNL noise contours presented in Section 3.2.4, Noise Affected Environment, were modeled based upon the anticipated aircraft operating levels for Calendar Year 2021 (CY21). "Implementation of the No Action Alternative would, by default, result in the same acreage and population coverage as noted under the affected environment (see Table 3.2.2)." As the affected environment is described as the same as the year 2021 No Action Alternative, it is not possible to determine whether "no significant impacts to the noise environment would occur with implementation of the No Action Alternative" as stated in this section. In fact, this conclusion seems highly unlikely.

7. Page 4-1 states, "The year 2021 is the end-state used in this analysis, which represents full implementation of the Proposed Action." While the end-state is a standard evaluation, NEPA documents often identify impacts in subsequent years that are deemed reasonably foreseeable. The end-state plus five years is often evaluated. The FEIS should explain effects in the years beyond the end-state that are reasonably foreseeable.

8. Tables presenting the area and population within the noise contours, e.g., Table 4.2-1, assume an average density of population throughout a reference census block. This unsupported assumption of homogeneity within census blocks calls into question the validity of the conclusions for determining relative impacts to populations. The Town encourages the Navy to use easily available aerial photography or windshield surveys to confirm the data in these tables.

9. Given the importance of housing in evaluating noise and land use compatibility of actions, the Town encourages the FEIS to include the number of dwellings/houses by political jurisdiction and the noise contour bands,

10. The Town encourages that the FEIS note the noise sensitive uses (schools, hospitals, nursing homes, libraries, etc.) that are located within each contour, in addition to the dwellings noted above.

11. While the DEIS notes that all action alternatives and scenarios would have a significant noise effect, the criteria for what changes make these effects significant are not defined. Thus, it is not clear how or if the various mitigation measures discussed would alleviate the significant effects. The FEIS should clarify the criteria applied to reach the conclusion of significant effect.

12. The FEIS should identify specific mitigation measures that would reduce the significant effects acknowledged by the DEIS. A connection between the effects and how and where the mitigation measures would reduce action-related effects should be made for the decision maker’s consideration. Otherwise, the benefits of the mitigation individually and collectively cannot be understood. Mitigation measures should be considered as operational measures of the Navy and its aircraft as well as preventive and corrective land use measures for residual noise effects.
13. The DEIS uses aircraft noise exposure for purposes of considering effects to public health and to the socio-economic fabric of the action area. Although the DEIS identifies a significant action-related noise effect, the effects on public health and safety and various socio-economic conditions are determined to be not significant. The FEIS should explain how this determination was made.

14. The DEIS discusses the results of research concerning the effect of noise impacts on property values. However, there is no quantification of project-related effect or determination as to significance. The FEIS should explain how a significant noise effect of the action would translate into property value effects considering the report’s summary of research showing a noise effect on property values.

15. While sleep disturbance is evaluated at 19 points of interest, the DEIS is not clear about the methodology used. Reference is made to the DNWG guidance document, but not to the SEL or number of events used to identify the percentage of the public likely awakened. The FEIS should explain the methodology used to reach the conclusions.

16. All the alternatives would increase potential hearing loss due to the number of additional people that would reside within higher noise exposure areas that might have the potential to experience a noise induced permanent threshold shift. However, given the quality of the maps and summary nature of the tables, the portion of the population within the town who may be so affected is not identified. As noted for other metrics, this metric should be specific to each political jurisdiction.

17. In the evaluation of Environmental and Safety Risks to Children, the focus is on identifying the number of children who reside in the 65 DNL and greater contour. All alternatives/scenarios would increase the number of children in the 65 DNL relative to the No Action Alternative. The DEIS does not deem these increases significant, despite the significant increase in noise. The FEIS should clarify why the significant noise effects do not translate into significant effects to children.

18. The analysis of Classroom/Learning Interference at nine points of interest is the principal tool used to consider action effects on education. Two metrics were used to evaluate effects on classrooms. First, the Leq during school hours was calculated. Then the number of events that could interfere with hearing classroom lessons (events with noise exceeding Lmax of 50 dB) was identified. The FEIS should provide an additional metric showing the number of minutes each day that speech communications would experience interference.

19. The DNL maps appear to show Scenario A DNL contours of 65 and 70 dB extending well into the corporate limits of the Town and into established residential neighborhoods. (DEIS Volume II, Page A-67, e.g.) DOD document number 4165.57, effective March 12, 2015, regarding Air Installations Compatible Use Zones (AICUZ) provides a table (Table 2, Page 23) of land uses suggested for compatibility with DNL zones. Residential uses are listed as not compatible with 65-69 and 70-74 DNL zones. The notes associated with Table 2 state:

“Although local conditions regarding the need for housing may require residential use in these zones, residential use is discouraged in DNL 65-69 and strongly discouraged in DNL 70-74. The absence of viable alternative development options should be determined and an evaluation should be conducted locally prior to local approvals indicating that a demonstrated community need for the residential use would not be met if development were prohibited in these zones. Existing residential development is considered as pre-existing incompatible land uses.” (emphasis original) (Page 27)
Where new development is allowed in these zones, the notes provide noise attenuation requirements to be incorporated in building codes. The DEIS evaluates scenarios where the 65 DNL and 70 DNL are expanded into existing neighborhoods within the Town. The FEIS should evaluate the Action Alternatives and associated scenarios in the context of creating circumstances that are “discouraged” and “strongly discouraged” by the DOD’s AICUZ guidance. Further, the FEIS should identify mitigation measures to lessen or avoid these impacts.

**Accident Potential Zones/Land Use**

According to DEIS Table 4.3-1 on Page 4-119, the number of proposed FCLP operations represented by Scenarios A and B would require the delineation of Accident Potential Zones (APZ). The size of these zones could include hundreds of acres in Ebey’s Reserve and potentially a portion of the Town of Coupeville. We also understand that once these APZ’s are established, Island County and possibly the Town of Coupeville, will be required to establish land use regulations that will limit future use of property and potentially severely reduce the property value of many existing homes. The DEIS does not adequately address the location and size of such APZ’s, the economic effect they will have in central Whidbey and the Town of Coupeville, potential land use changes, or related safety issues. We request that the FEIS include all of this information in more detail for each alternative and the steps necessary to mitigate these effects.

**Water**

The Town understands that existence of PFOA and PFOS as a contaminant in the groundwater, aquifer, and public and private wells is not addressed in the DEIS. The Town and surrounding property owners and water associations depend on a sole source aquifer for potable water. Currently, there are no alternative water sources to wells. The Town also understands that further study is needed on the extent of the contamination before mitigation can be considered and that this issue is being managed by Navy Region Northwest. The Town understands that this contamination happened in the past, likely due to the use of Aqueous Film Forming Foam (AFFF) a firefighting foam, and is not directly related to increased operations proposed in the DEIS. However, the Action Alternatives propose to increase flight operations, which would result in an increased potential for accidents, including fire emergencies on or in the vicinity of the airfields. Therefore, the Town requests that the final EIS include a commitment from the Navy that existing stocks of toxic AFFF’s will not be maintained or used at OLF Coupeville and that only firefighting foams approved by the EPA or not containing constituents regulated by the EPA or for which the EPA has not issued advisories will be used at OLF. If the use of available AFFF’s remains a potential response to aviation-related fires, the increase in its potential use as related to an increase in aircraft operations should be evaluated as a potential impact and mitigation measures proposed.

**Mitigation**

After studying all alternatives, we find the mitigation proposals lack relevance and are not commensurate to the multifaceted effects of increasing FCLP operations at OLF Coupeville by as much as 500%. The engineering of chevrons to lower the decibels of the Growlers and the development of Magic Carpet technology to reduce the number of FCLP required for each pilot, while interesting, may or may not come to fruition. Continuing to adhere to the policies and procedures for safe operations of a Growler should be in practice already and in no way mitigates the effects of increased operations at OLF
Coupeville. It seems little effort was put into potential mitigation measures, especially, as we commented at the start of this process, it seemed predestined to site all Growlers at NASWI. The Town requests that the FEIS propose and evaluate mitigation measures on the full range of alternatives that may reasonably meet the need for the proposed action as expressed in the DEIS. As noted elsewhere in this letter, the mitigation measures considered in the FEIS should have a rational nexus to significant impacts, provide a measurable improvement in the level of such impacts, and have a reasonable potential for implementation at the time the impacts will occur. True mitigation alternatives that should have been considered more closely include, but are not limited to, detachment squadrons, off site training, not single-siting all Growlers at NASWI, and increased military housing.

Final Comment Period
We realize a comment period on the FEIS is not required. However, we are asking that the FEIS incorporate and analyze a large quantity of new and more relevant information, examples would be: current housing data, supplemental noise data, APZs and noise zones better defined and mapped, explanations of criteria for alternatives (considered and not considered), a commitment to protect groundwater, and an explanation of noise effects inconsistencies. Because of this, we strongly request that you allow an additional 60-day comment period after publication and before a Notice of Decision is issued.

We would like to end our comments to the DEIS as we began, with great respect and gratitude for all the men and women in our military, specifically those sharing our Island at NASWI. It is not our desire to close OLF Coupeville, but rather to come to an agreement on the number of operations we can support in proportion to the economic, cultural, and lifestyle hardship that would result. We would like to suggest that OLF Coupeville continue to support approximately 6,200 operations per year as an option within the FEIS. We fervently believe there is a way to provide the Growler pilots the specialized training they need to do their job safely, without significantly impacting the property owners, residents, business owners, and visitors of Coupeville and central Whidbey Island. Thank you for the opportunity to comment.

Molly Hughes, Mayor
Jackie Henderson, Town Council Member
Catherine Ballay, Town Council Member
Dianne Binder, Town Council Member
Pat Powell, Town Council Member
Lisa Bernhardt, Town Council Member

cc: Senator Patty Murray
    Senator Maria Cantwell
    Congressman Rick Larsen
    Governor Jay Inslee