August 28, 2018

Congressman Larsen – Adam.LeMieux@mail.house.gov
Senator Cantwell – joe_downes@cantwell.senate.gov
Senator Murray – ann_seabott@murray.senate.gov

Dear Congressman Larsen and Senators Cantwell and Murray,

As we near the release of the Final Environmental Impact Statement (FEIS) from the Navy, we would like to make one more appeal for your intervention regarding the increased Growler operations at Outlying Landing Field (OLF) Coupeville. The Coupeville Town Council and I are asking for your help to dramatically reduce the number of operations allowed at OLF Coupeville, before a final record of decision is signed.

With 36 new Growlers being stationed at NAS Whidbey Island, for a total of 118, we understand more pilots are required and the need for field carrier landing practice (FCLP) will also increase. We want our Navy pilots to receive the training they need in order to carry out their missions and fly safely. However, we don’t think that 80% of that training should take place adjacent to Coupeville and over Ebey’s Landing National Historical Reserve. This is clearly a disproportionate hardship for our small community.

As their name suggests, Growlers are exceedingly loud aircraft. This fact cannot be overstated. FCLPs involve low altitude approaches and full-power take-offs and turning movements, generating maximum noise impacts to an otherwise quiet rural community. The Town of Coupeville is a mere 10,000 feet from the end of the runway and, as documented in the EIS, the OLF pattern is the airspace immediately above the working family farms that constitute a significant element of the cultural landscape that is Ebey’s Landing National Historical Reserve. The Town and the surrounding countryside were recognized by Congress as a national treasure that honors our heritage. The magnitude of changes currently proposed by the Navy may threaten the very basis of Congress’s designation. The Town provided comments to this effect as part of the Section 106 consultation for this proposal. Our concern is that the policy was set ahead of the environmental review process.

From an economic standpoint, it is clear having a Navy Base on the Island provides jobs, sales tax, and increases spending in the local economy. These benefits are mostly felt in Oak Harbor’s economy. We feel it is appropriate and equitable that the majority of the FCLP training happen in Oak Harbor, too.
Central Whidbey’s economy is heavily dependent on Ebey’s Landing National Historical Reserve and the environment it creates. “Place Based Tourism” draws visitors who want to enjoy a quiet and historic location. Lodging, retail, dining, destination events, and many types of outdoor recreation all depend on the culture that was created by, and is preserved by, Ebey’s Reserve. A four-fold increase in FCLP’s will severely impair our Place Based Tourism and our residents.

One of the many reasons the Reserve was created by Congress 40 years ago was our Community’s desire to save the historic agricultural lands in Central Whidbey. Working outside on the farms will become unhealthy and unsustainable with the level of flights proposed by the Navy. This will hurt our economy and our culture.

Another reason the Reserve was created was to prevent high density development on this agricultural land. The protection of the Reserve lands was accomplished, sometimes at great sacrifice to private land owners, and has been sustained for 40 years. Now, in a cruel twist of irony, these low development rates and low population counts are two of the reasons the Navy is using to justify moving 80% of FCLP’s to Central Whidbey.

At the level of operations the Navy is proposing for OLF Coupeville, not one, but two Accident Potential Zones (APZ) will need to be created. This will change land use and values, affect property taxes, destroy some businesses and create new safety concerns in Central Whidbey. APZ’s have already been created in Oak Harbor for Ault Field and the appropriate land use exists under them.

The Navy is using historical data showing as many as 32,000 operations have taken place at OLF Coupeville in the past, thus justifying their preferred alternative as consistent with prior use. Between 1988 and 1992, during Desert Shield and Desert Storm, the Navy did fly between 24,000 and 32,000 operations per year at OLF Coupeville. However, even then, even when the need to prepare more pilots for active duty was greater, the number of operations at Coupeville was only 34% to 39% of the total FCLP’s flown during those years. The rest were flown at Ault Field. History shows that, even in times of active military engagement, OLF Coupeville has not borne the majority of FCLP operations.

During the past six years (2013–2018) the Navy has kept the number of FCLP’s to the allowed 6,100 per year at OLF Coupeville, even as the number of Growler pilots has increased at the Base. Also during this time, Navy pilots have received the training they need, by either flying at Ault Field or other locations. Some of these locations include NAF El Centro, NAS Oceana, NAS Norfolk, NALF Fentress and NAS North Island. We do not feel that the use of other, existing locations for FCLP training was given consideration in the draft EIS and subsequent Preferred Alternative.

We firmly believe the majority of Coupeville citizens do not want to see NAS Whidbey Island go away. We also believe that the majority of Coupeville citizens support OLF Coupeville and the critical pilot training it provides. We believe the citizens of Central Whidbey would accept an increase in operations at OLF if it is proportional and necessary. With that in mind, we propose the following mitigation ideas and ask for your advocacy on our behalf:
• With the increase in jets and squadrons being stationed at NAS Whidbey Island the total number of FCLP’s will increase by 23%. We ask that our share of that increase also be 23%. This would increase the total allowable operations at OLF Coupeville from 6,100 per year to 7,500. 7,500 would equal 26% of the total FCLP operations.

• Commit to not flying more than 5,000 operations on either pattern. This would eliminate the need to create APZ’s at OLF Coupeville.

• Formalize the current “handshake agreement” of “no-fly weekends”. This would allow lodging and event venues to take long term reservations in good faith, knowing Friday night, and all day Saturday and Sunday will be quiet. More importantly, it would assure our citizens of at least the weekends being peaceful, a large part of the reason people choose to live here.

• A commitment from the Department of Defense and the Department of the Navy to work with Congress and Washington State to obtain mitigation funding for sound retrofits to existing buildings in Central Whidbey.

• A similar commitment for mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey area because of significant noise increases.

We recognize the Navy’s efforts to lower the total amount of FCLP’s needed for the Growlers by 30% (20% due to MAGIC CARPET technology and 10% due to one less pilot per squadron) from the draft EIS to the announcement of their Preferred Alternative. This is significant and appreciated.

Again, the Town of Coupeville supports the men and women in our armed forces, especially the Navy enlisted at NAS Whidbey Island. We understand and respect the need to provide all Growler pilots with the best training possible. We ask that the Navy understand and respect the economy and the way of life we have built and the National Historical Reserve we have been protecting for 40 years.

Sincerely,

Molly Hughes
Mayor, Town of Coupeville

cc: Captain Arny, NASWI – matthew.arny@navy.mil
Helen Price Johnson, Island County Commissioner – district1@co.island.wa.us
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