August 16, 2018

Naval Air Station Whidbey Island
Attn: Captain Geoff Moore & Captain Matthew Arny
3730 North Charles Porter Avenue
Oak Harbor, WA 98278-5000

Subject: Continuing Section 106 consultation on the finding of adverse effect to historic properties for the proposed increase in EA-18G Growler operations at Naval Air Station Whidbey Island, Island County, WA

Dear Captain Moore and Captain Arny,

The Coupeville Town Council and I thank you for the opportunity to consult on the mitigation proposal for the adverse effects to the Central Whidbey Island Historic District due to the increased operations of Growler aircraft. As much as any part of the Navy’s environmental review for the current proposal, the potential for impacts to historic properties is central to this community’s concerns.

Ebeys Landing National Historical Reserve/Central Whidbey Island Historic District

The Town of Coupeville is a proud and integral part of the Central Whidbey Island Historic District (District) and Ebeys Landing National Historical Reserve (Reserve). Protection of the cultural landscape that defines and describes the District, and that gained greater recognition with Congress’s creation of the Reserve, is a guiding principle for the Town and its citizens. The District and the Reserve are, according to their descriptions in the National Register and Public Law 95-625, whole systems rather than collections of individual elements. Together, these elements, within the natural and built context of the District, establish a cohesive identity that is inseparable from the parts. It is in this context, this cultural landscape, this encompassing historic property that is under threat from the proposed action. No portion of the District and Reserve is severable or expendable. Harm to one portion is harm to the whole.

The Reserve was established by Congress in 1978 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 Reserve includes prairies, woodlands, uplands, Penn Cove, a rural town, agricultural land, historic buildings, the night sky, and rural soundscapes.
A significant and considered part of the District and Reserve is preservation of agricultural areas in active use. Loss of ongoing farming activities would result in a material change to the cultural landscape and understanding of the Reserve and would compromise its very foundation. Within the Reserve, these cultivated areas are primarily under the flight path of aircraft conducting Field Carrier Landing Practice (FCLP). Immediate, not averaged, impacts to farmers and their employees working outdoors are not merely a distraction but a potential health issue. This issue has led some current small farmers to conclude that they cannot continue to maintain their farms and till the soil if the frequency of flights increases as expected under the preferred alternative.

Preservation of the ‘historical record’ has been actively pursued for 40 years, sometimes at great personal sacrifice to the residents of the Reserve. As a community, we encourage the adaptive re-use of historic resources. We protect the night sky. We conscientiously steward rural land use and limit growth and development. It is deeply troubling that the historic attributes and character we have worked so hard to protect are now the justification the Department of the Navy uses as reasons to increase flights and the associated detrimental impacts at OLF Coupeville and over Ebey’s Landing National Historical Reserve.

Section 106

We understand this Section 106 consultation process and the corresponding ‘areas of substantive change in noise exposure’ (figure 11, page 45) were based on Alternative 2, Scenario A, or 80% of all FCLP operations taking place at OLF Coupeville. While the Department of the Navy has acknowledged this is their preferred alternative, the EIS has not yet been finalized. As subpart A of the National Historic Preservation Act states, conducting project planning activities prior to completing Section 106 compliance is not prohibited “provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking’s adverse impacts on historic properties.” The Town of Coupeville is concerned that the Navy’s planning for use of OLF has reached a point of no return past which full consideration of all alternatives for compliance with the Act cannot be reasonably considered.

Critical to the Section 106 process is the direction to resolve adverse effects by avoiding and/or minimizing the adverse effects and, where these preferred approaches are not determined feasible, providing compensatory mitigation measures to offset the adverse effects. It is our fervent hope that more emphasis can be placed on the direction to avoid and minimize the adverse effects by reducing the planned number of FCLP’s at OLF Coupeville.

The Secretary of the Interior’s Standards for the treatment of Historic Properties (36 CFR 800.5(a)(1)) describes the criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Adverse effects may include reasonable foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative. Introduction of visual, atmospheric or audible
elements will diminish the integrity of the District’s significant historic features. No buildings may be harmed through the proposed action. Clearly, however, those elements of setting and feeling have been impaired to some degree by the FCLP flights that currently occur and will only be more impaired by increases in low-altitude jet traffic over the Reserve. Further, the ability of the American public to enjoy what Congress created and what the past and present residents, farmers, property owners, and business owners have fostered and maintained will be impaired.

Again, we would strongly recommend avoiding and minimizing the adverse effect of noise in the Central Whidbey Island Historic District by decreasing the proposed number of FCLP operations at OLF Coupeville.

Current Mitigation from Navy
While we are appreciative of the Navy’s current policies to minimize adverse effects in our community as listed on page two of the Section 106 Executive Summary, continued practice of these policies will do nothing to mitigate the substantive change (increase) to noise exposure in new areas of the Reserve caused by a 288% increase in FCLP’s over current levels.

One of your current policies of “publishing flight operations on a weekly basis to assist the general public in making decisions about their daily activities,” does not provide mitigation to the owners of historic properties and buildings who have chosen adaptive reuse as event venues to accept long-term reservations in good faith or to those in the Reserve continuing the historic trade of small farm agriculture and who must work outside year-round.

The stated current policy of “restricting high-power jet aircraft turns prior to noon on Sundays and daily between the hours of 10:00 p.m. and 7:30 a.m.” is a bit confusing as, even now, FCLP’s are often conducted past 10:00 p.m. especially on longer summer days. We have also enjoyed an informal agreement to not fly Friday nights thru Sunday. We are concerned that the proposed four-fold increase in FCLP’s will no longer allow for noise mitigation on the weekend. Noise free weekends are crucial to tourism in Ebey’s Landing National Historical Reserve and to businesses in the Historic Commercial District in the Town of Coupeville.

Proposed Mitigation from Navy
The installation of informational kiosks is not commensurate or relevant mitigation to the adverse effects of a substantive increase to noise exposure in Central Whidbey. Updating historic property inventories/databases is not a proportional or relevant mitigation action to the adverse effects of a substantive increase to noise exposure in Central Whidbey.

While we applaud your long standing practice of purchasing the development rights of land as a preventative tactic to avoid inappropriate land uses around OLF Coupeville, continuing this practice does nothing to mitigate the adverse effects of a substantive noise increases for the existing residential and economic land uses that comprise Ebey’s Landing National Historical Reserve or for the experiential qualities for visitors.
Possible Mitigation Measures

More proportionate and relevant mitigation measures might include:

- A significant reduction in the proposed 288% increase in FCLP’s at OLF Coupeville so a smaller area experiences a substantive increase in noise exposure in the Central Whidbey Historic District.
- A significant decrease in the proposed four-fold increase in FCLP’s at OLF Coupeville so APZ land use restrictions do not become a restricting factor in the slow evolution of the District.
- A formal agreement for “no-fly weekends” to protect the tourism industry in the Central Whidbey Island Historic District.
- Ongoing emphasis and funding for technology like MAGIC CARPET that assures safe training for pilots while requiring fewer FCLP’s.
- 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 the Central Whidbey Historic District.
- A similar commitment for mitigation funding to purchase property from existing property owners who need to leave the Central Whidbey Historic District because of the significant noise increases.

We look forward to the opportunity to work with the Department of the Navy on future mitigation commitments to off-set the adverse effects of substantive increases in noise exposure in Ebey’s Landing National Historical Reserve, the Central Whidbey Historic District and the Town of Coupeville.

Sincerely,

Molly Hughes
Mayor

Cc: Kendall Campbell, NASWI Cultural Resources Program Manager
Kristen Griffin, Manager Ebey’s Landing National Historical Reserve
Helen Price Johnson, Island County Commissioner
Jay Inslee, Washington State Governor
Maria Cantwell, United States Senator
Patty Murray, United States Senator
Rick Larsen, United States Congressman