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**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515-4702

ARMED SERVICES

November 21, 2018

The Honorable Richard V. Spencer  
Secretary of the Navy  
1000 Navy Pentagon  
Washington, D.C. 20350-1000

Dear Secretary Spencer:

Thank you for your November 5 response letter to my inquiries regarding the ongoing Environmental Impact Statement (EIS) process for EA-18G Growler operations at Naval Air Station (NAS) Whidbey Island. I appreciate the prompt response to my previous letter and thoroughness of your comments.

I am encouraged by your commitment to conduct a detailed housing market analysis and to work together to increase funding for Oak Harbor School District. However, there are additional areas where I would appreciate clarification:

**Historical Comparison**

In my October 12 letter, I asked for a more sustainable distribution of Field Carrier Landing Practice (FCLP) flights between Ault Field and Outlying Field (OLF) Coupeville. To justify this request, I pointed to the historical use of the complex. Since 1976, the distribution of total FCLPs at OLF Coupeville has never exceeded 58 percent. Under the Preferred Alternative, 80 percent of FCLPs, 23,700 in total, would be conducted at OLF Coupeville. Only six times in the past 41 years has the total number of FCLPs at the OLF exceeded this figure.

In your response, you wrote that “[t]he historical division of FCLP between the two airfields does not inform what is practicable for future operations,” pointing chiefly to the added complexity of managing an airfield with multiple platforms. I am sensitive to this concern and pleased that the Navy, recognizing the value of NAS Whidbey Island, continues to site additional missions at the installation.

However, comparing airfield operations under the proposed alternative and historical usage was not originally my idea. When Congress was briefed on the Preferred Alternative, one of the “Key Takeaways” in the provided material was “Increase is consistent with past level of airfield operations.”<sup>1</sup>

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<sup>1</sup> US Navy. “Environmental Impact Statement (EIS) for EA-18G ‘Growler’ Airfield Operations at NAS Whidbey Island (Ault Field and OLF Coupeville).” Briefing delivered to Congressional staff, June 21, 2018.

In addition, the Final EIS points to historical airfield usage to minimize the significance of the impact of increased operations: “For each alternative and scenario, total airfield operations would increase but levels would be similar to historical levels of operations between the late 1970s and the 1990s. Therefore, while the Proposed Action may have a long-term impact on the character of communities, this impact would not be significant<sup>2</sup>.”

My question is simple: How does historical use of the complex inform the planning in the EIS and the recommended mitigation measures? I am concerned selective use of precedent could lead to a Record of Decision that diverges from historical use of the complex and an underinvestment by the Navy in mitigation. This discrepancy should be addressed in the Record of Decision.

### **MAGIC CARPET**

In your letter, you point to Maritime Augmented Guidance with Integrated Controls for Carrier Approach and Recovery Precision Enabling Technologies (MAGIC CARPET) software as “[o]ne of our most significant mitigations.” I have long supported MAGIC CARPET because precision landing mode will simplify one of the most complex operations in naval aviation, lessening the strain on aviators and safely reducing the number of qualifying flights needed prior to deployment. I successfully amended the Fiscal Year 2017 National Defense Authorization Act to affirm the support of the House Armed Services Committee for MAGIC CARPET.

However, I believe it is inappropriate to call MAGIC CARPET a “significant mitigation.” MAGIC CARPET is a fleet-wide initiative being deployed across multiple platforms independent of the ongoing EIS. And while I am pleased MAGIC CARPET installation led to a 20 percent reduction in the number of flights under each alternative, I urge the Navy to consider committing to “significant mitigations” directly related to the proposed action in the Record of Decision.

My support for NAS Whidbey Island, the sailors, families and the missions is steadfast. I am confident the product of the NEPA-required process will be a decision that supports the electronic attack mission while addressing impacts on the surrounding community. Thank you again for your sustained engagement on this issue of importance to my constituents and to national security.

Sincerely,



Rick Larsen  
Member of Congress  
Washington State, 2<sup>nd</sup> District

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<sup>2</sup> “Final Environmental Impact Statement for EA-18G ‘Growler’ Airfield Operations at Naval Air Station Whidbey Island Complex.” *WhidbeyEIS.com*, US Department of the Navy, 29 Sept. 2018, [whidbeyeis.com/Documents/Final/Chapter 4 - Environmental Consequences.pdf](http://whidbeyeis.com/Documents/Final/Chapter 4 - Environmental Consequences.pdf). Chapter 4.5.2.1.2