

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

ARMED SERVICES

October 12, 2018

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

Dear Secretary Spencer:

I am writing with regard to Navy operations at Naval Air Station Whidbey Island. I have heard from constituents about EA-18G operations at Ault Field and Outlying Field (OLF) Coupeville; some in support, some concerned. My support for Naval Air Station Whidbey Island, the sailors, families and the missions is steadfast.

On September 28, 2018, the Navy released the Final Environmental Impact Statement (FEIS) for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex. The preferred alternative is Alternative 2A, consistent with information released earlier this year. Under Alternative 2A, the number of Growler aircraft at the base will increase by 36 and total Growler field carrier landing practice (FCLP) operations will increase to 29,600. Eighty percent of these FCLPs will occur at the OLF.

This represents a significant increase in current levels of operations and a reversal of the historical distribution of FCLPs between the two airfields. This change in flight distribution will also lead to an increase in noise, particularly in Central Whidbey.

To mitigate the impact of the change to Whidbey Island, I request a commitment from the Navy to a more sustainable distribution of FCLPs and additional mitigation measures, which were developed in consultation with state and local officials, as well as community leaders:

- **Distribute FCLP flights more sustainably between the two airfields**

Under Alternative 2A, the authorized number of FCLPs at OLF Coupeville would increase 289% over the No Action Alternative, from 6,100 to 23,700. As the FEIS makes clear, this would greatly increase the amount of noise and the number of people impacted by noise in Central Whidbey.

In communicating with my office, the Navy has pointed to the overall increase in flights as "consistent with past levels of airfield operations." But since 1976, there have only been six years where FCLP operations at OLF Coupeville exceeded the number in the Preferred Alternative; most recently in 1992. In fact, the average annual number of FCLP operations at the OLF since 1976 is 12,925, or approximately 35 per day. I am concerned

that 23,700 operations per year, or 65 per day, may not be sustainable for Central Whidbey. In addition, the annual percentage of total FCLPs conducted at the OLF has never exceeded 58%.

I am aware that because of the set number of FCLPs required for training, any reduction in flights at OLF Coupeville leads to an increase in the number of FCLPs at Ault Field. This both increases noise in this area and disrupts other airfield operations. Based on my analysis of the historical level and distribution of flights, I believe shifting some of the proposed flights to Ault Field would be consistent with past use of the complex and a demonstration of the Navy's commitment to the people of Central Whidbey to be a good neighbor.

Therefore, I ask that the Navy find a distribution of FCLPs between the two airfields that is closer to the historical average and more sustainable for Central Whidbey while ensuring the necessary training occurs to fulfill all national security requirements.

- **Fund chevron development research in the President's budget request**

The FEIS correctly identifies chevron attachments for the F414 engine as a potential mitigation measure, although more research and testing are required before a final design can be implemented.

Much of the funding for this research has traditionally been a Congressional add. Since the program office believes that "chevron seals are currently the best means of reducing engine noise," I request that the President's Budget for Fiscal Year 2020 include the necessary Research, Development, Test and Evaluation funding for further chevron development, approximately \$12 million.

- **Fund hush house construction in the President's budget request**

Another possible mitigation measure is a hush house, which would allow engine run-ups to be conducted in a purpose-built hangar. The FEIS identifies a dramatic reduction in engine noise from these operations if a hush house is built. Presently, the 90 dB maximum noise level from an on-ground run-up extends beyond the installation boundary, and the 60 dB noise contour extends more than four miles from the tarmac. With construction of a hush house, this noise would be entirely confined to the base.

I ask that the Navy include in the President's Budget request for Fiscal Year 2020 sufficient funds for a military construction project to build a hush house at Ault Field. This would be consistent with existing precedent. When the hush house is built, NAS Whidbey Island will become the tenth installation in the Department of the Navy with a hush house. Additionally, there are deflectors, screens and other cheaper technologies which could be installed more rapidly to potentially reduce the impact of noise on communities surrounding Ault Field.

- **Formalize the handshake agreement to minimize weekend flight operations**

According to community members, NASWI has long had an informal agreement with them to avoid weekend operations to the extent possible. This helps bring predictability to flight schedules, demonstrates the Navy's commitment to be a good neighbor and is important for the economy in communities reliant on tourism.

In speaking with local officials, formalizing this agreement was one of their top asks of the Navy as the Record of Decision approaches. I ask that the installation formalize the commitment to minimize weekend flight operations, with the mutual understanding that operational needs may supersede this agreement when necessary.

- **Increase funding for Oak Harbor School District to expand classroom space**

In my conversations with the leadership from Oak Harbor School District, I have been struck by their commitment and enthusiasm for educating students from Navy families. Many instructors are themselves from Navy families. For them, ensuring students receive the highest quality education is a point of personal pride.

Based on nationwide and Whidbey-specific formulas, the additional 628 Navy personnel are expected to bring 226 more students to Oak Harbor School District. The FEIS acknowledges that DoD Supplemental Impact Aid does not fully cover per-student costs, although I was successful in increasing appropriations for this program by \$15 million in Fiscal Year 2019 appropriations.

With 42 portable trailers already being used for classroom instruction across Oak Harbor School District, additional portables are not a realistic option to accommodate the incoming 226 students without sacrificing instructional quality. Therefore, I ask for a commitment that the Navy and the Office of Economic Adjustment will work with my office and the Oak Harbor School District to increase funding for building permanent classroom capacity across the district, with a focus on elementary schools.

- **Conduct a more detailed analysis of the Navy's impact on the local housing market**

The presence of the Navy increases home values on Whidbey Island. Sailors and families buy and rent property in the community; some even choose to retire here when they leave the service. However, the benefits of the Navy are not equally distributed across the island. In communities farther from the base, around OLF Coupeville, the impact of jet noise may be reducing home values.

Last year, the Navy conducted a "Housing Requirement and Market Analysis" for Naval Air Station Whidbey Island and committed to repeating the study following publication of the FEIS. I request that the Navy conduct a thorough market analysis, which includes assessments of affordability and the Navy's impact on sale and rental prices, disaggregated by airfield.

- **Conduct real-time or near real-time noise monitoring**

The FEIS makes clear the advantages of using modeling to evaluate the impact of jet noise. It allows for comparison to other airfields and permits the Navy to simulate impacts of fifteen different scenarios.

I still believe that this process could be supplemented with a program to conduct noise monitoring at points of interest in the community. Doing so would allow the Navy to better determine the impact on historic properties, identify any discrepancies between modeled noise levels for individual flights and actual noise, and help build confidence in the community with the Navy's methodology.

- **Work with Congress on establishing a similar program to the FAA Noise Mitigation Program, including sound insulation for private homes**

The FAA has a program to mitigate noise in homes affected by commercial aviation near airports. Properties within the 65 dB day-night average sound level (DNL) contour that have more than 45 dB DNL inside the home are eligible for sound insulation, installed at no cost to the homeowner. This may include replacing windows and doors, installing baffles in HVAC vents and other measures as necessary. The DoD has no similar program, and homes impacted by military aviation noise are not eligible for the FAA program, as the upgrades are funded by passenger fees.

I believe the military should have a comparable program to install noise insulation at private homes affected by aviation noise, and I seek your commitment to work with me through the legislative process to establish such a program and identify a dedicated funding stream.

I appreciate the Navy's commitment to transparency and communication throughout this process. Extending public comment periods has allowed for more informed discussion about the proposed actions. The early release of the Preferred Alternative gave communities time to prepare for the FEIS. I look forward to your response to this letter in advance of the Record of Decision to better prepare my constituents for changes coming their way and demonstrate the Navy's commitment to the Whidbey Island community.

Sincerely,



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