



THE SECRETARY OF THE NAVY  
WASHINGTON DC 20350-1000

November 5, 2018

The Honorable Rick R. Larsen  
House of Representatives  
Washington, DC 20515

Dear Representative Larsen,

Thank you for your October 12, 2018 letter regarding Navy operations at Naval Air Station (NAS) Whidbey Island. I am committed to working with you to address the concerns of your constituents and support the needs of our national security, and specifically Navy aviation.

During the Environmental Impact Study (EIS) process, which included extensive public involvement, the Navy received input on a wide range of issues, particularly regarding concerns about the increased number of operations and noise. As reflected in the Final EIS, we attempted to address public concerns and implemented mitigation to reduce noise impacts on the community. One of our most significant mitigations was the commitment to employ the Precision Landing Mode (aka, Magic Carpet) technology which, when combined with a reduction in the number of pilots per squadron, reduced Field Carrier Landing Practice (FCLP) requirements under the preferred alternative by 30 percent from the Draft EIS. This was a significant reduction in the number of proposed aircraft operations. We are also considering additional mitigations which I discuss in more detail below in response to your specific requests.

Distribute FCLP Flights More Sustainably Between Ault Field and Outlying Field (OLF) Coupeville

OLF Coupeville is currently used about 90 hours/year or about 1 percent of total available hours. The Navy is proposing an increase in operations at the OLF under our preferred alternative to about 360 hours/year, or about 4 percent of available hours. The majority of time, (96 percent of available hours) there will be no FCLP operations at the OLF.

The historical division of FCLP between the two airfields does not inform what is practicable for future operations because of the significant change in the type of aircraft based at NAS Whidbey Island (NASWI). Airfield management at Ault Field is complex because of the need to manage dissimilar platforms. In the 1970s, the maritime patrol community relocated to former NAS Moffett Field, California, and Ault Field was home to only tactical aircraft. Managing tactical aircraft operations alone (A-6E and EA-6B) enabled a much more efficient flow of air traffic, and allowed a substantial number of FCLP operations to be conducted at Ault Field without significant interference with other operations. As part of Base Closure and Realignment 1993, the maritime patrol community returned to NASWI and the P-3C was introduced at Ault Field. The return of tactical fighter aircraft and the growth of Maritime Patrol and Reconnaissance Wing operations created new challenges in the

management of Ault Field airfield operations due to differing speeds and mixed air traffic patterns. Looking to the future, the number of maritime patrol squadrons at Ault Field will double from three to six as three Hawaii-based squadrons relocate to Ault Field, and the maritime patrol community will transition from the P-3C to the P-8A aircraft by 2021. To support the training mission of the EA-18G, Ault Field is also home of Navy search and rescue (SAR) helicopters, which provide critical support in the event of a training mishap and provides valuable SAR to the community. As resources allow, and to maintain SAR crew proficiency, the NASWI unit works with local agencies to respond to local emergencies, including medical evacuations. To date in 2018, the NASWI SAR unit has conducted 60 missions throughout Washington State, including 42 rescues, 8 searches, and 10 medical evacuations.

The preferred alternative focuses FCLP operations at OLF Coupeville to more effectively manage airfield operations and balances readiness requirements. It also considers noise impacts on the surrounding community in that Ault Field is surrounded by a much larger population. Conducting a large number of FCLPs at Ault Field creates congestion, which results in delays and degrades available training time. It also extends the airfield pattern and hours of operation at Ault Field, thereby creating greater impacts on the surrounding community. OLF Coupeville was constructed specifically for FCLP training. The OLF offers superior FCLP training since OLF Coupeville more closely mirrors the conditions a pilot will experience at sea.

#### Fund Chevron Development Research

I support additional funding to further develop innovative technologies that will enable us to meet our readiness requirements and also reduce aircraft engine noise. The FY19 National Defense Authorization Act provides for \$1.9 million to continue research into chevron seals. Testing has confirmed that chevron technology has some positive effect on noise output; however, it also demonstrated that redesign and additional testing is necessary to fully assess any noise-reduction benefits and potential drawbacks.

#### Fund Hush House Construction

The Navy estimates that under the preferred alternative, the average time jet engine run ups during Growler maintenance would be approximately five minutes per day. Using the Day-Night Average metric, the hush house's effect would mostly be within the confines of Ault Field, and there would only be between a 0.2 decibel and 0.3 decibel reduction estimated to occur off-station south of West Sleeper Road. Given the estimated \$20 million cost of a hush house and current fiscal environment, it is difficult to justify funding for a hush house when our noise analysis in the EIS shows minimal benefit to the community.

### Formalize the Handshake Agreement to Minimize Weekend Flight Operations

NASWI is committed to being a good neighbor and, as you point out, works closely with the community to avoid weekend operations to the greatest extent possible. This commitment is a part of Department of the Navy's overall noise abatement best practices, which are memorialized in Appendix H of the Final EIS. We will continue to implement these best practices and publish our operational schedules ahead of time to allow citizens to plan their days and activities around operations.

### Increase Funding for Oak Harbor School District

It is critically important to both the Navy and the local community that students receive the highest quality education. I commit to working with the Department of Defense (DoD) Office of Economic Adjustment (OEA), your office, and the Oak Harbor School District for increased funding to address this issue. My office has contacted OEA to identify possible projects that could help the Oak Harbor School District, especially their elementary schools and will prioritize those projects with the demands of the DoD budget.

### Conduct a More Detailed Analysis of Navy's Impact on the Housing Market

I agree housing availability is important to the Navy and the community, and the Navy commits to conducting a follow-up housing market analysis study after the Record of Decision (ROD).

### Conduct Real-Time or Near Real-Time Noise Monitoring

Noise modeling is the validated and accepted methodology for assessing noise impacts and allows for informed decision-making when looking at various operational alternatives. While significant misinformation regarding modeling has been circulated, modeling has been found to be a reliable and accurate way to assess noise impacts. For example, in previous litigation involving the Navy, the U.S. District Court in Seattle determined that noise measurements from a plaintiff's acoustic report, when converted to the noise model standard, were not significantly different or more severe from what was analyzed through the Navy's noise model. Similarly, the findings of the Navy's analysis were reinforced by noise measurements taken by the National Park Service (NPS) in Ebey's Landing National Historic Reserve that closely correlated results from Navy's noise modeling.

The impact on specific points of interest (POI) from aircraft operations has been analyzed in the EIS, and allows for informed decision-making when looking at various operational alternatives. The Navy included several supplemental metrics in the Final EIS, including modeled single-event noise that provides the highest potential noise impact to POIs. In response to public comments, the Navy expanded the number of POIs for detailed analysis from 30 to 48, and included locations up to 30 miles away from NASWI. POIs include schools, medical facilities, high-density areas, historic locations, and parks.

Work with Congress to Establish a Similar Program to the FAA Noise Mitigation Program

DoD has a noise abatement program that has already adopted many FAA Part 150 strategies as described in Appendix H of the Final EIS. This includes developing aircraft noise maps and joint land use studies to help inform local land use decisions, working with third parties to obtain conservation easements to prevent future incompatible development, development of flight tracks that avoid populated areas where possible, scheduling operations to avoid days or times that would be most impactful to the community when operationally feasible, and the purchase of Readiness and Environmental Protection Integration easements.

I will work with you to investigate additional noise mitigation options in coordination with the other Federal agencies and the military services. The Navy has experience working cooperatively in other locations with military aircraft (i.e. NAS Oceana) to identify mutually beneficial solutions. No mitigation program, however, will be successful without local zoning restrictions that prevent incompatible development near the airfield. After the ROD, the Navy will prepare a new Air Installations Compatible Use Zones study that will help the Navy and local municipality make informed land use recommendations and decisions, respectively.

The Navy remains committed to a fully transparent process with close and continuous communications. NASWI represents one of the economic cornerstones of Island County and the State of Washington. Moreover, the increase in Growler operations at NASWI will significantly enhance our electronic warfare capabilities. Therefore, it is of paramount interest to both the Navy and the State to preserve the operational readiness of this national asset. I appreciate your steadfast support of this critical mission, our Sailors, and their families. If I may be of further assistance, please do not hesitate to let me know.

Sincerely,



Richard V. Spencer