



December 20, 2018

Mr. John Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

RE: Proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and
Development of Support Facilities, NASWI

Project Tracking Code: 102214-23-USN

Dear Mr. Fowler:

I am contacting you as the Washington State Historic Preservation Officer (SHPO) regarding the US Navy's Termination of Consultation for the proposed Increase of EA-18G Growler Aircraft and Aircraft Operations and Development of Support Facilities, NASWI, Oak Harbor, Island County, Washington.

We believe it is important to draw to your attention the longstanding multiple unresolved topics on this undertaking.

We first raised our concerns on the definition of the Area of Potential Effect (APE) in May 2017, when we disagreed with the 65 dBA DNL noise contour as the geographic boundary.

We reiterate our concerns that the project APE defined as "...the area encompassed by the 65 dBA DNL noise contour, that would exist in 2021 as represented by the No Action Alternative", is too restrictive, and does not include portions of the region that will face comparable effects from "visual, atmospheric, or audible elements" as those areas within the 65 dBA lines.

We note that the DEIS states that "... APE boundaries will be updated as consultation continues between the SHPO, consulting parties, American Indian tribes and nations, and other interested parties." Therefore, we continue to request an expanded APE to include additional portions of Whidbey Island, Camano Island, Port Townsend vicinity, and San Juan Islands.

Further, we are not convinced that the 65 dBA serves as the best or most appropriate measure for quantifying and assessing harmful levels of sound and vibrations from Growler activities.

Our concern is based upon what appears to be an averaging of sound levels over long time periods that does not adequately capture the real time experience of brief but more numerous exposures to higher decibel levels, as well as the cumulative effect of these events.



Further, we note that the U.S. Department of Housing and Urban Development has posted on HUD Exchange (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) standards that classify 65 dB as “normally unacceptable” and above 75 as being “unacceptable.” Given discussion on page 4-194 of the Kester and Czech 2012 study at NSAWI finding takeoff sounds levels greater than 110 dBC, fosters additional concern of noise levels of historic properties receiving exposure to 75 dB and the need for further, perhaps ongoing, site specific sound testing, data gathering, analysis and a commensurate level of mitigation measures.

In a related comment, discussion in Chapter 4 on operational impacts of vibration on historic properties states “No significant physical damage as a result of aircraft operations has been reported to these structures as a result of continuous operation of aircraft for over 70 years” (p. 4-195) and “... sound levels damaging to structural components of buildings are not likely to occur.” (p. 4-50)

Again, our concerns are not allayed by these statements about the cumulative impacts of vibration and sound waves on the structural integrity of historic buildings/structures in the APE and beyond in communities such as Coupeville and Port Townsend.

It is important to note that other federal agencies recognize the adverse effect of noise impacts on historic properties and responded by implementing mitigation measures to address these direct impacts.

An example is the Federal Aviation Administration (FAA) that put into place a Sound Attenuation Program to sound-proof residences in neighborhoods surrounding King County Airport (aka Boeing Field) in Seattle.

Another recent example is the Federal Highway Administration (FHWA) has memorialized their extensive commitment to noise mitigation in a Programmatic Agreement for the SR 520 Bridge Replacement Project in Seattle. FHWA committed to numerous measures including construction work windows to minimize noise impacts on residents, installing and monitoring the use of “quiet pavement” along with specified construction and haul routes, installing noise walls, and redesigning structural bridge elements to reduce noise along with commitments to monitor the effectiveness of these efforts.

This program was memorialized in a memorandum of agreement (MOA) in 2010, that required consultation with the SHPO when undertaking sound-proofing measures in historic residences in accord with the *Secretary of the Interior’s Standards for Rehabilitation*.

Furthermore, and even if a consensus were reached that the sound waves and vibration associated with flight operations have only minor impact on structural integrity, there is a concern that historic building owners will take steps to remedy rattling windows and replace cracking walls and ceilings with inappropriate replacement materials and methods, if not total replacement or abandonment, of the structure.

Aside from our stated concerns about decibel levels and impact on historic properties in Ebey’s Landing National Historical Reserve (EBLA) and central Whidbey Island, we do not want to overlook very real concerns about the economic impact to the community from declining tourism resulting



from degraded visitor experiences. University of Washington's 1995 study of visitor experiences to EBLA indicated that visitors were attracted to the Reserve to enjoy the scenery, nature, history, and to look at real estate. The direct economic impact of visitor expenditures (lodging, food, shopping, etc.) was calculated to be approximately \$8 M in 1995 or over \$13 M in 2018 dollars. More compelling is the multiplier effect of tourism dollars as they flow through the local economy for supplies, professional services, household expenditures, etc. The UW study calculated these secondary expenditures at \$16.4 M in 1995 or over \$27 M in 2018 dollars. Plus, as the study pointed out, these calculations do not include expenditures by new residents during intervening years attracted to the area for its amenities. Clearly, even small declines in tourism expenditures resulting from a degraded visitor experience would have a significant impact on local businesses and government tax revenues.

Overall, our larger concern about this proposal is the long-term and cumulative effects of increased flight operations on the character and qualities of historic places and communities that will experience increased levels and frequencies of noise. We do not see firm evidence in documents the Navy provided that the characteristics and qualities that have drawn generations to the region to live, work, and recreate will not be significantly diminished, if not eventually lost, as a result of increased flight operations.

As Title 54 SC 302303 details, the State Historic Preservation Officer is the state authority to establish if the proposed mitigation proposed by the US Navy is sufficient or not. I have repeatedly stated the insufficiency of the proposal to mitigate the noise impacts.

Please feel free to contact me at 360.586.3066 or at Allyson.brooks@dahp.wa.gov

Sincerely,



Allyson Brooks, Ph.D., Director
State Historic Preservation Officer

cc: Jim Baumgart, Governor's Office
Captain Matthew Army, NAS Whicbey
Thomas McCulloch, ACHP
Katherine Kerr, ACHP
Deborah S. Stinson, Mayor, City of Port Townsend
Molly Hughes, Mayor Town of Coupeville
Kendall Campbell, NASWI Cultural Resources Program
Kristin Griffin, Trust Board of Ebey's Landing NHR

