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*Preserving America's Heritage*

February 19, 2019

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

*REF: Proposed Increase of Aircraft and Aircraft Operations and Development of Support Facilities  
Naval Air Station Whidbey Island  
Island County, Washington*

Dear Mr. Secretary:

In accordance with Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800), I am writing to convey to you the final comments of the Advisory Council on Historic Preservation (ACHP) regarding the Department of the Navy's (Navy) proposed increase of EA-18G Growler aircraft and aircraft operations and development of support facilities at Naval Air Station Whidbey Island (undertaking). On November 30, 2018, the Navy terminated the Section 106 consultation, having determined that further consultation to reach an agreement was unlikely to be productive. In accordance with 36 CFR § 800.7, the ACHP is providing these comments, which you must consider before reaching a final decision on the undertaking.

This has been a challenging case for the ACHP as well as the Navy and the numerous consulting parties. Balancing the operational needs of the Navy to meet its paramount national security mission and readiness requirements with the important historic values present in the Central Whidbey Island Historic District, which embraces the unique National Park unit, Ebey's Landing National Historical Reserve, demands efforts that transcend mere procedural compliance with the NHPA. It is the ACHP's sincere hope that you will accept and follow the ACHP's recommendations in that spirit.

## **Background**

Naval Air Station Whidbey Island (NASWI) is home to all Navy electronic attack squadrons flying the EA-18G Growler aircraft in the United States. The Navy's tactical Electronic Attack functions have been performed almost exclusively at NASWI since 1970. Ault Field provides facilities and support services for nine carrier squadrons, three expeditionary squadrons, one expeditionary reserve squadron, one training squadron, and an Electronic Attack Weapons School for a total of 82 aircraft. The Navy is the only U.S. military service to maintain an Electronic Attack aircraft capability and is required to preserve and cultivate the expertise and knowledge of the Growler community. The Navy has indicated that Section 5062 of Title 10 of the United States Code requires it to carry out the undertaking in order to maintain and expand Growler operational readiness to support national defense requirements.

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The Navy has determined that Outlying Landing Field (OLF) Coupeville, an integral part of operations at Ault Field, provides the most realistic training for field carrier landing practice (FCLP), as well as training for search-and-rescue and parachute operations and has continuously used OLF Coupeville for FCLP since the late 1960s. The altitude above ground at which the EA-18G Growler aircraft fly the landing pattern at OLF Coupeville closely replicates the altitude of the aircraft carrier landing pattern. OLF Coupeville is located on a 200-foot ridge surrounded by flat terrain, similar to how an aircraft carrier is situated at sea. The Navy has concluded that practicing at an altitude which simulates the carrier environment is essential for pilots preparing to land on an aircraft carrier, because such practice matches the visual cues as well as the required power settings needed to fly a safe approach for an actual landing on an aircraft carrier.

In 2013, the Navy began exploring the introduction of additional EA-18G Growler squadrons to continue and expand its existing community in order to provide an increased and flexible electronic attack capability to address future threats and missions. The Navy has determined that maintaining and expanding EA-18G Growler operational readiness supports the Navy's national defense requirements under Section 5062 of Title 10 of the United States Code. Congress authorized the purchase of additional EA-18G Growler aircraft in 2015 and 2016 to support the Navy's mission.

### **The Undertaking**

In order to increase EA-18G Growler capacity and meet current and future mission and training requirements, the Navy plans to:

1. Continue and expand existing EA-18G Growler operations at the NASWI complex, which includes FCLP by EA-18G Growler aircraft at Ault Field and OLF Coupeville;
2. Increase tactical Electronic Attack capabilities by adding 35 or 36 aircraft (for a grand total of 117 or 118 EA-18G Growler aircraft) to support an expanded Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment;
3. Construct and renovate facilities at Ault Field to accommodate and support the additional EA-18G Growler aircraft; and
4. Station additional personnel and their family members at the NASWI complex and in the surrounding community.

Ault Field would support 88,000 total airfield operations (takeoffs and landings), which represents an increase of 9,800 annual operations over current conditions. OLF Coupeville would support 24,100 annual operations, which represents an increase of 17,590 operations per year. While there would be an increase in operations at both airfields, Ault Field would still support four times the number of total aircraft operations than OLF Coupeville. The implementation of this undertaking will result in significantly increased noise impacts from aircraft operations, in some cases with noise levels exceeding 90 decibels (dB) at a number of historic sites. For example, operations with 90+ dB levels will quadruple at locations such as Reuble Farm, a contributing resource to the Central Whidbey Island Historic District.

### **Historic Properties**

The Navy has identified numerous historic properties within the Area of Potential Effects (APE) for this undertaking. These include the Central Whidbey Island Historic District (CWIHD), listed in the National Register of Historic Places on December 12, 1973, which is located partially within OLF Coupeville. The current nomination includes, in private and public ownership, 103 contributing buildings, six sites, 286 structures, and one object. The District is significant under National Register criteria A, B, and C with a period of significance from 1300 to 1945, with areas of significance in agriculture, architecture, commerce, recreation/tourism, ethnic heritage, exploration/settlement, education, religion, military, and politics and government. The APE also includes 10 landscapes contributing to the significance of the CWIHD: Ebey's

Prairie, Crockett Prairie, Smith Prairie, San de Fuca Uplands, Fort Casey Uplands, East Woodlands, West Woodlands, Penn Cove, Coastal Strip, and Coupeville. The land area of the historic district currently includes approximately 17,400 acres.

The Ebey's Landing National Historical Reserve (ELNHR), or Ebey's Reserve, boundary is identical to the CWIHD boundary. Established under Section 508 of the Parks and Recreation Act of 1978, the ELNHR was created "to preserve and protect a rural community which provides an unbroken historic record from...19th century exploration and settlement in Puget Sound to the present time." The reserve is the only "historical reserve" in the National Park System. ELNHR was created to be managed through a partnership between the local community and government agencies, with administrative management carried out by a Trust Board. The four managing partners of Ebey's Reserve are the National Park Service (NPS), Washington State Parks, Island County, and the Town of Coupeville. Approximately 85 percent of the land within the reserve is privately owned, with the rest a combination of local, state, and federal ownership.

### **The Section 106 Process**

The Navy initiated Section 106 consultation in October 2014. Consulting parties include the Washington State Historic Preservation Officer (SHPO), the Island County Commissioners (Districts 1 and 2), the Town of Coupeville, NPS, the Trust Board of Ebey's Reserve, Washington State Parks, Seattle Pacific University, Mr. David Day, and the Citizens of Ebey's Reserve. The Navy's efforts to identify consulting parties included outreach and notification to potentially interested Indian tribes that resulted in no requests by any of the tribes to become consulting parties. The ACHP elected to participate in consultation in December 2014.

In 2016, the Navy proposed an APE to consulting parties. Consistent with past practice, the Navy proposed to define the auditory effects component of the APE as those areas on and off the installation within the 65 dB Day Night Sound Level (DNL) noise contour that result from air operations at NASWI. This DNL is commonly used by other federal agencies, including the Federal Aviation Administration, as the metric used to assess noise effects on communities. The 65 dB threshold is typically considered "acceptable" for most land uses, and it is the ACHP's experience that agencies commonly determine it to be a reasonable threshold below which historic properties are usually not affected.

After discussing with the ACHP and the SHPO and taking into account comments made by consulting parties and those received under the National Environmental Policy Act (NEPA) that the original APE was too small, the Navy expanded the APE in July 2017 based on an updated noise analysis, using the latest approved noise model for the 65 dB DNL. This expansion included all of ELNHR to ensure all potential effects to the CWIHD were fully evaluated.

In October 2017, the Navy informed consulting parties that it was extending its environmental review to conduct additional analysis to incorporate changes to training requirements that may reduce impacts to local communities. The changes were based on the introduction of new landing technologies that would reduce the Navy's requirement for FCLP and result in fewer operations and personnel than previously projected. This would also result in possible revisions to noise modeling if necessary.

In June 2018, the Navy determined that the increased frequency of noise exposure would result in adverse effects to characteristics of the CWIHD that currently make it eligible for listing in the National Register of Historic Places. Although the effects would be intermittent, the Navy determined the proposed undertaking would result in an increased occurrence of noise exposure affecting certain cultural landscape components in the historic district—specifically, the perceptual qualities of five locations that contribute to the significance of the landscapes. The Navy found no other adverse effects to historic properties from the proposed undertaking. While not accepted by all consulting parties, the SHPO concurred with this finding.

In July 2018, the Navy began consulting on measures to mitigate the adverse effects. Consulting parties considered a multitude of mitigation measures ranging from the modification of aircraft engines to quiet the noise to installing information kiosks regarding the ELNHR. During this consultation, in September 2018, the Navy released its Final Environmental Impact Statement (FEIS) under NEPA. By November 2018, the ACHP was aware that the Navy was concerned it may not be able to reach agreement with the SHPO and execute a Memorandum of Agreement. The ACHP worked with representatives from the Navy and the SHPO to identify a set of measures that would be acceptable to required signatories. The final set of measures the Navy proposed were as follows:

- Providing NPS with funds, not to exceed \$1 million to support preservation projects that enhance the landscape integrity of the Ebey's Prairie landscape (one of the five identified landscape components of the CWIHD) by preserving and protecting the Ferry House and an associated cluster of outbuildings and structures. The Ferry House is an iconic building located at Admiralty Inlet and owned by the NPS;
- Seek partnership opportunities through the Readiness and Environmental Protection Integration (REPI) Program to support the creation of scenic easements; and
- Communicate to NASWI personnel that volunteer opportunities exist in ELNHR.

The SHPO informed the Navy on November 29, 2018, that it would not be signing the agreement with the mitigation as proposed by the Navy. Soon after, the Navy determined that further discussions would no longer be productive and terminated Section 106 consultation through a letter conveyed to the ACHP on November 30, 2018.

As part of developing its comments to the Navy, ACHP staff hosted a public meeting on December 19, 2018, in the Town of Coupeville to solicit public input. The ACHP's website also provided information on the termination and requested public comment. The ACHP received more than 250 comments regarding the proposed undertaking from consulting parties, members of the public, and a member of Congress. The ACHP was originally required to submit its comments to the Navy on January 14, 2019. However, due to a lapse in appropriations starting on December 22, 2018, all ACHP employees were furloughed, and the ACHP's timeline to provide final comments was suspended until appropriations were approved on January 26, 2019, making its deadline for submitting these comments February 19, 2019.

### **ACHP Findings**

- *The ACHP has no basis to question the Navy's determination that it must meet operational requirements by expanding existing EA-18G Growler operations at NASWI.*

Some consulting parties and many members of the public have expressed concern about the impact of increased noise on historic properties within and near the APE and urged the Navy to station EA-18G Growlers elsewhere, possibly at multiple installations. Recognizing the importance of considering alternative locations as a way to avoid or minimize affects to historic properties from the undertaking as a key part of the Section 106 review process, the ACHP sought an explanation regarding the decision and the rationale for having the EA-18G Growlers stationed at NASWI during the consultation process. The Navy clarified that the need and requirements for a tactical Airborne Electronic Attack platform can only be met by the EA-18G Growler and that the relocation of such squadrons away from NASWI and to another installation would incur significant costs, increase operational risk associated with potential timeline impacts of relocation, and reduce operational synergies associated with single-siting the Growler community. Additionally, the United States Senate Committee of Armed Services Report for the FY2017 National Defense Authorization Act references the EA-18G Growler as the nation's only tactical Airborne Electronic Attack platform. There is nothing in the record of the Section 106 proceedings that gives the ACHP a basis to contradict the Navy's conclusions

regarding these operational requirements and the suitability of NASWI to meet them.

- *Disagreements regarding the APE that complicated the consultation can be resolved through further monitoring of noise impacts if expanded operations go forward.*

The ACHP received several comments pertaining to the APE, as defined by the Navy, as being too narrow in scope, having excluded Port Townsend, Fidalgo Island, the San Juan Islands, Camano Island, and the Olympic Peninsula, and having relied on the 65 dB DNL contour line. The ACHP provided comments in 2016 recommending that the Navy draw the APE as broadly as possible to take into account both direct and indirect effects of the undertaking. The ACHP understands that using the 65 dB DNL is a metric commonly used by federal agencies to assess noise effects on communities and provide the threshold of a noise no longer being “acceptable.” At the same time, rigid adherence to such a standard may not provide the most effective way to address indirect and intangible effects that may in the long run harm historic properties. In response to comments from the SHPO, ACHP, and consulting parties, the Navy did expand the APE, and consultation then progressed to the resolution of adverse effects.

The ACHP recognizes that the use of the 65 dB DNL metric may not effectively measure the human perception of noise impacts, by calculating a projected average between the unusually loud single event noise levels and the unusually quiet ambient noise levels. This is particularly true when the potential adverse effects on historic properties are not direct physical impacts but are dependent upon the perception and resultant behavior of residents, property owners, businesses, and visitors. Predicting and measuring such effects can be elusive until the expanded operations are actually underway. Continued monitoring and evaluation can provide the necessary information for developing and implementing long-term minimization and mitigation strategies for the important historic resources.

- *Foreseeable adverse effects were considered by the Navy, but further study is advisable if the expanded operations are pursued.*

Some consulting parties and members of the public expressed concern that the Navy did not adequately identify and address adverse effects to the economy of Whidbey Island, specifically in the agricultural and tourism industries, in its evaluation of increased operations at OLF Coupeville. Section 106 requires an agency to take into account adverse effects to historic properties, including those that may be reasonably foreseeable. The Navy considered whether the proposed changes in operations at OLF Coupeville have the potential to introduce auditory, visual, and atmospheric characteristics that could cause effects to historic properties. Based on current information, other effects such as property owners not investing in rehabilitation or maintenance of buildings or structures, or complete abandonment of properties, may be possible but are not reasonably foreseeable at this time. While not required to meet the procedural requirements of Section 106 in this case prior to the approval of the proposed undertaking, the ACHP believes further study is warranted to assess whether these effects on historic properties become probable rather than possible (or actually occur) if the undertaking is approved and flight operations are expanded as proposed. This will improve the evaluation of effects of this nature.

- *Mitigation measures negotiated in accordance with Section 106 procedures reached an impasse due to disagreement on appropriate mitigation and time constraints.*

The ACHP received numerous comments that mitigation proposed by the Navy was inadequate in relation to the adverse effects of increased EA-18G Growler operations. Many commented that no amount of mitigation was adequate and that avoidance (i.e., not increasing operations at all) was the only alternative plausible for the Navy to consider. The Section 106 process requires federal agencies to consider alternatives to avoid, minimize, or mitigate adverse effects, but does not mandate specific measures or prescribe any substantive

standard to determine the adequacy of such avoidance, minimization, or mitigation actions. After the Navy proposed providing funding for preservation projects outside of its jurisdiction, consulting parties were unable to agree on which projects could, or should, be considered for funding or what amount was adequate. While the ACHP did opine on appropriate mitigation measures up to and just prior to termination, the recommendations below contain the ACHP's most current and complete advice on those and other measures it believes appropriate to resolve adverse effects to historic properties and provide long-term stewardship of the historic properties it may affect by this undertaking.

- *Challenges in the coordination of the Section 106 and NEPA review processes complicated timelines for consultation.*

The ACHP noted several instances where the continuity and flow of Section 106 consultation was affected by the decisions made by the Navy as part of its NEPA review. Pauses in Section 106 consultation created confusion among some consulting parties, while others were unclear about the scope of Section 106 and NEPA reviews. In October 2017, consulting parties were informed that the Navy was updating the noise analysis under NEPA to incorporate changes to the Navy's operational training requirements and would consult on changes to the APE and inventory once the update was complete. Consulting parties were not re-engaged by the Navy until June 2018 when it issued a letter amending the APE and inventory, updated the proposed undertaking, and provided its finding of adverse effect for the CWIHD. By July 2018, consulting parties were made aware of the Navy's desire to conclude the Section 106 consultation process with an executed Memorandum of Agreement no later than October 2018 in order to meet its NEPA timeline, which left three months for consulting parties to consider and discuss alternatives to avoid, minimize, or mitigate the adverse effect. The discussion regarding alternatives to avoid, minimize, or mitigate was severely limited given timelines for concluding the NEPA process.

Finally, the FEIS was released after the Navy's findings of effects under Section 106 and therefore was informed by such findings. However, the ACHP believes it is preferable for agencies to refrain from issuing an FEIS until the Section 106 process has concluded. Doing so better enables an agency to address both the effects on historic resources and steps being taken to resolve them in the FEIS.

## **Recommendations**

While the Navy used generally accepted modeling and sound impact "averages" to assess adverse effects, the nature of auditory effects on historic properties is such that they are highly difficult to predict using rigid standards of decibel noise levels. Addressing the actual impacts on historic properties would benefit from further refinement based on the results of sound monitoring of expanded operations, should they commence. The Navy's long-term stewardship of historic properties potentially affected by this undertaking would therefore be well served by collaborating with local stakeholders to monitor how increased noise events actually end up affecting tourism and investment in preserving historic properties in the area and impact those characteristics that contribute to the historic significance of the CWIHD. Building such a collaborative relationship is in the best interests of the Navy, NPS, interested Indian tribes, the SHPO, local government, and citizens to promote the long-term preservation and vitality of the unique historic resources of the CWIHD.

In order to achieve these and other goals, the ACHP provides the following recommendations if the Navy elects to go forward with expanded operations as proposed:

- *The Navy, working with the stakeholders, should undertake additional efforts to monitor and, as needed, develop measures for addressing effects to the affected historic properties.*

The ACHP recommends that the Navy collaborate with identified consulting parties from this Section 106 consultation, federally recognized Indian tribes, or other organizations or individuals with interest in identified

historic properties to develop a noise monitoring program to measure actual direct and indirect effects, including cumulative effects, of operations to historic properties, namely the CWIHD, in order to have a fuller understanding of effects and measures to address them. Such monitoring may lead to the finding, and resolution (e.g., perhaps through possible repairs or sound reduction measures) of unanticipated effects on historic properties during implementation of the undertaking as set forth in the Section 106 implementing regulations at 36 CFR § 800.13(b). As is the case with almost all Section 106 agreements, the last draft of the Section 106 agreement that was being negotiated for this undertaking included a provision for such post-review discoveries.

During this monitoring, the Navy should give special attention to physical impacts on historic properties and effects to the intangible historic and cultural values of the CWIHD to further understand how property owners and tourists interact with historic properties on Whidbey Island. The ACHP also recommends that the Navy collaborate with NPS, the SHPO, and the Trust Board of Ebey's Reserve to update the CWIHD nomination given the passage of time of both the original nomination (with amendments) and the designation of ELNHR in order to best understand character defining features. This action should be carried out early enough to refine the Navy's understanding of specific effects to historic properties and put in place appropriate measures to mitigate them.

- *The Navy should commit to carrying out mitigation measures in further discussions with stakeholders.*

The ACHP recommends that the Navy work with the previously identified stakeholders to develop suitable mitigation measures based on the results of the recommended ongoing monitoring of impacts on the historic properties. The Navy should be open to providing funds to support such measures with the goal of advancing the long-term preservation of the historic characteristics of the CWIHD. While consultation just prior to the Navy's termination of Section 106 consultation focused on efforts to provide funding to NPS for rehabilitation activities at the Ferry House, the ACHP believes that a broader range of support should be considered. The Navy should also examine creative means of funding and carrying out such measures, including exploring partnerships with the Department of Defense's Office of Economic Adjustment and the ACHP, which possesses potentially useful authorities to achieve these goals (including some that may allow the Navy to provide funds, through the ACHP, to an organization it may not otherwise be able to provide funds to directly).

- *The Navy should pursue innovative partnerships and techniques to promote the long-term preservation of affected historic properties.*

The ACHP recommends that the Navy work with the stakeholders to identify future operational and development plans that may affect historic properties, and to explore opportunities through the REPI Program to support creation of conservation easements, possibly in cooperation with the Whidbey Camano Land Trust.

The ACHP further recommends that the Navy collaborate with the stakeholders to evaluate the benefits of designating historic landscapes within the APE as Sentinel Landscapes to enhance the long-term protection and management of these important resources. The Sentinel Landscapes program is jointly managed by the Departments of Defense, Agriculture, and the Interior and identifies places where preserving the working and rural character of key landscapes strengthens the economies of farms, ranches, and forests; conserves habitat and natural resources; and protects vital test and training missions conducted on those military installations that anchor such landscapes. Such added protections may benefit both the Navy mission and the protection of historic properties.

- *The Navy should pursue additional noise minimization measures and adopt feasible noise-reducing technologies for EA-18G Growler operations based on the recommended ongoing evaluation of the nature and extent of effects to historic properties from aircraft noise.*

The ACHP recommends that the Navy work with the stakeholders to continually review operational procedures to identify potential changes that reduce noise, such as restricting hours of flight operations, while supporting mission execution. The Navy should evaluate current policies that might impede its ability to provide support to the local community regarding noise compatibility using the Federal Aviation Administration's Residential Sound Insulation Program (14 CFR Part 150, "Airport Noise Compatibility Planning") as a model. An example of this is the San Diego County Regional Airport Authority's Quieter Home Program. The Authority works with property owners within the 65+ dB level contour map around San Diego International Airport to determine if they are eligible for sound insulation treatments to mitigate aircraft noise. Over the longer term, the Navy should pursue the development and implementation of new noise suppression technologies and landing software with the goal of minimizing the impact of aircraft operations on the affected historic properties.

- *The Navy should better coordinate environmental and historic preservation reviews.*

The ACHP recommends that the Navy evaluate its efforts in this consultation to coordinate its NEPA and Section 106 reviews to determine where improvements can be made in the future to reduce confusion about the scope of each review and ensure that Section 106 determinations and findings have the maximum potential to inform decisions made under NEPA. This review should be informed by the joint handbook issued by the ACHP and Council on Environmental Quality titled *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106 Reviews*.

## **Conclusion**

The ACHP urges the Navy to accept and carry out these recommendations, should it determine to implement the undertaking in this location. Section 800.7(c)(4) of the Section 106 regulations requires you, as the head of the agency, to take these comments into account in reaching a final decision on the undertaking. As required by Section 110(l) of the NHPA (54 U.S.C. § 306114), you may not delegate this responsibility. A summary of your decision regarding the undertaking that contains the rationale for the decision and evidence of consideration of the ACHP's comments must be provided to the ACHP prior to the approval of the undertaking and shared with the Section 106 consulting parties and the public.

You and I have an obligation as federal agency leaders to advance the policies that the Congress set forth in the NHPA, directing that the federal government exercise leadership in the preservation of the nation's irreplaceable cultural heritage. In that spirit, I hope you will see these recommendations as a wise path forward. I can assure you that the ACHP would welcome the opportunity to work with the Navy and the stakeholders to achieve the accommodation of important historic preservation values as the Navy carries out its essential mission.

I look forward to your response.

Sincerely,

Milford Wayne Donaldson FAIA  
Chairman