



## Town of Coupeville

4 NE Seventh ▪ PO Box 725 ▪ Coupeville WA 98239  
360.678.4461 ▪ 360.678.3299 Fax ▪ [www.townofcoupeville.org](http://www.townofcoupeville.org)

January 9, 2015

EA-18G EIS Project manager (Code EV21/SS)  
Naval Facilities Engineering Command Atlantic (NAVFAC)  
6506 Hampton Boulevard  
Norfolk VA 23508

RE: U.S. Navy Environmental Impact Statement for the EA-16G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island – Scoping Comments

To Whom It May Concern:

This letter is an addendum to the letter submitted on January 2, 2014 regarding the EA-18G EIS, which has now been revised to include the possible increase of up to 36 additional aircraft.

In addition to our comments of January 2, our concerns about the potential for a significant increase in aircraft are primarily related to the increased frequency of operations. Our experience with the Growlers, vs the Prowlers, is that the aircraft is much louder, has more reverberation, and that flights within the patterns have varied as a result of training activities and numbers of aircraft in a flying rotation at one time.

Overall, we request that there be no increase in the number of flights/hours of flight allowed under the current EA, and that flight operations be mitigated to reduce their impact on our residents and community. In terms of mitigation, we include the following additional considerations:

- Training flights currently do not occur on weekends. We suggest that no flights occur Friday-Sunday, which provides the opportunity for residents and our large tourist contingence to enjoy the outdoors for 3 days each week, with certainty.
- Flight patterns be reviewed for options to varying the pattern, providing relief to some residents when flights occur on contiguous days, for example, alternating between patterns on contiguous days.
- Schedules should also be reviewed for day and night flights on a more tolerable schedule, for example, starting at beginning of dark for night flights and flight operations terminate at midnight.

- That the number of aircraft in the flight pattern be limited to a number that can maintain the normal pattern. We have observed that too many jets in the air at one time, particularly with less experienced pilots, causes the pattern to “push out” over areas that are normally not flown over.
- We have learned that leadership at the squadron, Wing and base command level changes about every two years. It would be helpful to develop written training information that is passed down with changes of command, to minimize changes that we have seen occur as a result of new people who are unfamiliar with the conditions in this community.
- Coupeville is located in the heart of Ebey’s Reserve. The Reserve was created to preserve the cultural landscape of farming that has existed since the first settlers arrived on Whidbey Island. Private landowners have sold the development rights to their land, and are restricted to its use for farming. Farming has changed over the years, and we are seeing more who are farming on a small scale, intense with labor, rather than farmers riding in tractors and on equipment. The noise and reverberation of the Growlers has made outdoor work very difficult on flight days. Consideration to outdoor workers, in the flight pattern and schedule, is critical to maintaining this important part of our economy and heritage.
- Finally, we strongly reiterate our January comment that modifications to the aircraft be developed to reduce noise/reverberation.

Thank you for giving us the opportunity to provide additional input on the potential for increased activity of the Growlers at NAS Whidbey Island and OLF.

Sincerely,



Nancy Conard  
Mayor

Dianne Binder, Councilmember



Bob Clay, Councilmember



Jackie Henderson, Councilmember



Molly Hughes, Councilmember



Patricia Powell, Councilmember

