DANGEROUS SAFETY ISSUES REVEALED AT OUTLYING FIELD COUPEVILLE

A review of Navy Airfield Design criteria reveals that OLF Coupeville (OLFC) does not meet general safety criteria for runways constructed before 1982. Although the Department of Defense requires that all safety issues are resolved prior to accepting a new mission or new aircraft, the Navy made no attempt to resolve serious issues prior to transitioning to the Growler.

The Navy promotes OLF Coupeville as the best place in the world for field carrier landing practice (FCLP), even though it knows it is not, as noted in this internal Navy email:

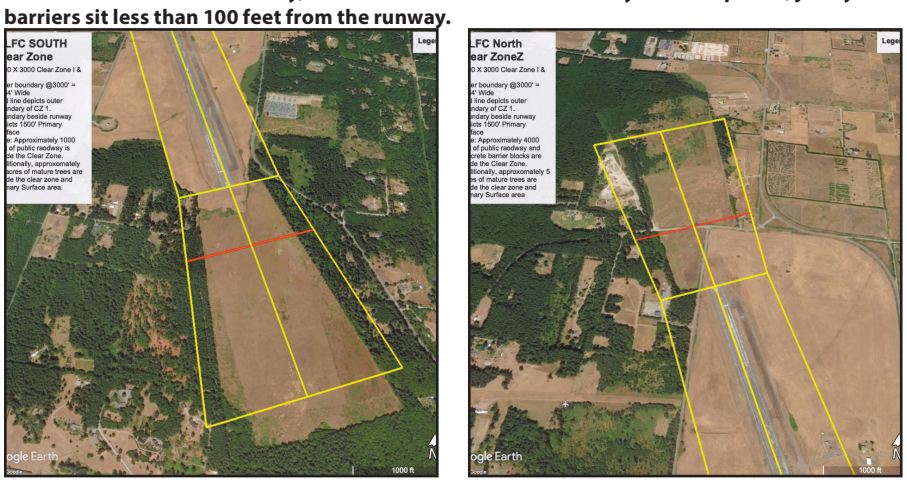
> *"The unmodified carrier landing pattern at NAF El Centro and the unique at-sea ambient lighting and environmental conditions of nearby San Clemente Island provided higher quality of training than could be achieved at either Ault Field or Coupeville reducing the need to maximize the use of Coupeville."*

The following are 6 significant reasons the OLFC is actually one of the worst places for FCLP training.[1]

1. Clear Zone (CZ) and Primary Surface (PS) safety requirements.

The Navy is bound to follow Department of Defense Instruction 4165.57, which stipulates that the Clear and Primary Surface zones be 1500 feet wide and extend 3000 feet from the end of the runway. These areas are supposed to be smoothly graded and free of obstructions. Yet at the OLFC the Navy has installed huge concrete jersey barriers, in some places less than 100 feet from the runway. In addition, Patmore Road, Keystone Hill Road and WA 20 are well inside the CZ. These roads come with traffic signs, drainage ditches and parked cars, none of which are allowed in the CZ. In addition, state road maintenance shops, approximately 35 acres of trees, several other buildings and an auto storage area are all inside the safety zones. The photos below reveal a few of these safety requirement violations.

Photos below are the South (left) and North (right) ends of the runway. The CZ is bounded area at each end of the runway, and PS on each side of the runway. In some places, jersey barriers sit less than 100 feet from the runway.



2. If wet, the runway is too short for an emergency landing.

The Navy should not be practicing at OLFC when the runway is wet. Internal Navy correspondence stipulates that "the Electronic Attack Wing SOP specifies 5000 feet as the minimum runway for an emergency landing" — that is, the necessary stopping distance or "landing roll" following a touchdown. That distance will vary with speed, density altitude, weight of the aircraft, headwind or tailwind, wet or dry or icy surface, the technique of the individual pilot, and of course, the nature of the aircraft's problem.

According to the flight manual for the Growler, a 46,000 pound aircraft landing into a 10-knot headwind would need 3400 feet of landing roll. The same aircraft under the same conditions except on a wet runway would require 5800 feet, putting it 400 feet into the CZ. Without a headwind, the aircraft would need 6786 feet on a wet runway putting it 1386 feet into the clear zone, well across Keystone Hill and Patmore Roads and into the area where people hang out to watch the practice.

Spectators and cars inside the Clear Zone directly under the flight path.

Cars park inside the CZ less than 100 feet from the runway.

These are serious breaches of DoD and Navy directives that clearly put aviators and civilians at risk in the event of a Growler mishap. Navy policies provide for the granting of waivers for airfield deficiencies under certain circumstances. A search of Navy documents failed to find any such waiver as required by UFC 2-000-05N, and it is questionable as to whether Navy officials would grant such a waiver. Civilians are simply not supposed to be present inside Clear zones. Yet the Navy locally has done nothing to prevent these encroachments and has actually advocated for "jet tourism" instead, encouraging spectators during training at OLFC

3. Accident Potential Zones (APZs) put children in harm's way

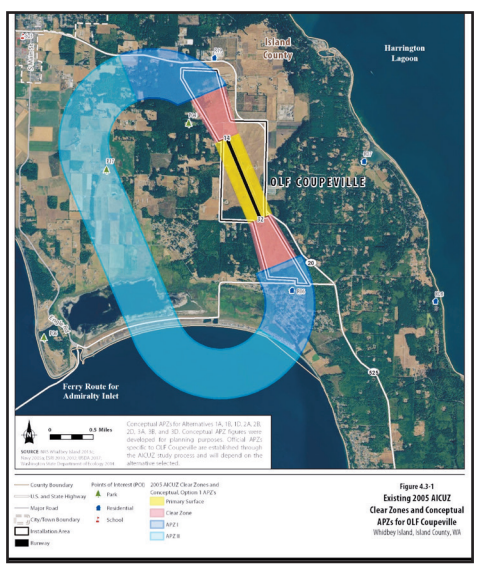
The OLF will experience about 24,000+ annual FCLP operations. That far exceeds the threshold for establishment of Accident Potential Zones (APZs). Whether the County adopts APZs or not has no bearing on the attendant risk factors. Either way the mishap risks remain the same.

Navy's depiction of Primary Surface (yellow),

Clear Zone (pink; 3000' long),

APZ-1 (dark blue; 5000 feet long),

and APZ-2 (light blue; 7000 feet long) at the OLF.



These APZs have high accident potentials and their land uses are therefore limited and exclude places where children congregate—like schools. But crashes can and do occur outside the APZs. The F-18 crash into an apartment building in Virginia Beach in 2012 occurred outside the APZ-22. Check out this video of that mishap: **https://youtube.com/watch?v=iR_PcZPy-6g** .

Executive Order (EO) 13045 requires the Navy to evaluate the effects of its FCLP actions on children. Instead, the Navy's dismisses the risks as non-existent. Neverthelss, they exist.

The Coupeville High School and Middle School and a private daycare center are just outside, to the west of the APZ. Ryan's House, the youth athletic field in Rhododendron Park, and Admiral's Cove Beach Club's olympic size swimming pool are all inside APZ-1. All are places where youths congregate. Fort Casey, with its swimming pool and multiple barracks used by youth groups numbering in multiple hundreds, is within 3,000 feet of APZ-2.

Furthermore, the FCLP pilots routinely fly well outside of the APZ boundaries, as depicted in the photo below. That means they are far closer to Coupeville's schools than depicted in the EIS. The Navy acknowledges that, as in this email from the Community Planning Liazon Officer: *"It's also important to note that the tracks shown on the maps are not centerlines in the sky that aviators will fly exactly every single time... aircraft will be either left or right, or north or south of these tracks depending on wind direction, wind speed, fuel loads, number of aircraft, experience, etc..."* In actuality, they are almost always outside of the depicted flight paths.

Typical Growler FCLP 2000 feet outside the Navy's widest designated flight path coming within 600 yards of Coupville's high school.

Picture take at corner of Fort Casey and Terry Roads. See similar video athttps://www.youtube.com/watch?v=pSoj-bvyvh8&feature=youtu.be

4. High bird strike risks surround the OLF.

Recognizing the potential risks to aircraft, pilots, and civilians, the EIS admits that bird strike (BASH) events are a safety concern *"attributable to both the installation's* [OLF and Ault Field] *location within the Pacific Flyway and the occurrence of water-filled ditches, freshwater wetlands, marine shoreline, perch sites, tall brush, and short grass in the vicinity of the runways...[M]ost reported bird strikes occur at an elevation of less than 1,000 feet AGL…To reduce the potential for BASH, the FAA and the military recommend that land uses that attract birds (e.g., agricultural fields, landfills) be located at least 10,000 feet [about 2 miles] from an airfield. All of these conditions attract numerous bird species, and their presence creates a potential BASH risk…."*

The downwind FCLP leg for OLFC Track 32 takes Growler pilots 600 feet above ground and directly over sprawling agricultural fields and 430-acre Crockett Lake with its additional extensive marshlands, a major refuge for migrating and resident waterfowl.

From Crockett Lake the pilot then crosses the marine waters of Admirals Cove, which host waterfowl, raptors, pelicans, and gulls trading between the lake and salt water. The pilot then proceeds directly over 12-acre Admirals Lake at about 400 feet above ground as it begins its final approach. As a part of the Class-A Crockett Lake wetland, this lake is heavily used by waterfowl, herons, gulls and eagles throughout the year. Just beyond that is a dense suburban development in harm's way of a BASH event. Finally, in the landing field, eagles and harriers are frequently

Photo of American White Pelicans flying over Crockett Lake and thousands of gulls loafing on the shallow flats.

observed soaring over the OLF grasslands.

From bounce takeoff to approach there are significant bird strike risks that cannot be mitigated away at the OLF and which, instead, have been largely swept under the EIS carpet. A review of Air Force BASH data reveals that an accident involving an American White Pelican costs, on average, $43 million. In other words, the aircraft doesn't survive. But it is not just the aircraft, given the number of civilian residences and businesses in proximity to Crockett Lake, a bird strike bringing down a Growler could be catastrophic.

5. Wind direction does not replicate carrier landing conditions

The EIS emphasizes: *"The Navy established requirements for FCLP airfields in order to ensure that FCLP realistically trains naval aviators to land on an aircraft carrier...These requirements are crucial because landing on an aircraft carrier is perhaps the most difficult operation in military aviation...To be* ***suitable for FCLPs****... the runway [should be] aligned with the prevailing winds."* That is because landings and takeoffs on a carrier are **always into the wind.**

The OLF, however, does not align with the predominant wind in spring and summer. Yet those are the two seasons when most of the FCLPs are conducted and at which time the wind is predominantly westerly, or crossing the runway. A runway at Ault Field, however, is aligned with the westerly wind. It would provide for training that mimics carrier landings, except that too much other air traffic there thwarts its use for FCLPs. So the OLF is used even though it is most often **not** *"suitable for FCLPs."*

6. Weather conditions force frequent cancellations of practice sessions

Fall and winter weather also severely constrain OLF use. In 2017 and 2018, 32% and 23% practice sessions were canceled at the OLF versus 0% and 3% at Ault Field (FOIA data). In an internal email Captain Moore (July 28, 2017) explains:

> *"We assume that not having Ault Field as an automatic back-up to OLF will lead to longer nights Friday night flying and weekend flying at OLF Coupeville. In 2015/2016, 33 of 101 [33%] scheduled OLF Coupeville fly days were cancelled--primarily for wind constraints and weather ceilings. In addition on five occasions we started at the OLF and had to move to Ault Field due to wx* [weather/ceilings]*...we believe...that over the course of a full year unconstrained that the wx impacts would be as much if not more impactful."*

During November 2020, 7 of 15 (47%) scheduled practice days at OLF were canceled, and the first instance of Friday night practice was scheduled for November 13.

Thank you for being informed and supporting our Noise Impacted Community

Board of Directors, Citizens of Ebey's Reserve

1 Full documentation, references, and citation sources are available at https://citizensofebeysreserve.com/wp-content/uploads/2020/12/OLF-Deficiencies.pdf