

## **Ault Field Airspace: Can it Handle More FCLPs?**

Citizens of Ebey's Reserve  
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The court, relying on information provided by the Navy, said that “the Navy has operated FLCPS around pre-ROD levels in two of the last three years at Whidbey Island.” But that is inconsistent with the FOIA information and personal log data presented in Table 1 of Exhibit A, which reveal that FCLP operations at the OLF have more than doubled since the 2019 ROD. in Table 1 for the years 2015 through 2023 Tables 2–4 of Exhibit A to this declaration provide backup for Table 1. The findings I believe most notable are as follows:

1. FCLP operations at the OLF increased from about 6,000/year before the Record of Decision to about 14,000 thereafter; *i.e.*, operations more than doubled.
2. For the same period, FCLP operations at the Ault Field decreased from about 20,000/year before the Record of Decision to around the projected number of 5,900 operations, or about one third of prior levels.
3. The Navy's sole reason for shifting nearly all the FCLP operations from Ault Field to the OLF was that air space would be too constrained otherwise. In its EIS the Navy indicated it is able and anticipates handling 88,000 annual operations of all aircraft at Ault Field. The FOIA data in Table 1 of Exhibit A to this declaration, however, reveal that all-aircraft operations at Ault Field in recent years have been around 50,000 operations, or far less than the projected 88,000 operations. That indicates there is an abundance of air space available for shifting FCLP operations back to Ault Field from the OLF.
4. In addition, Navy records reveal that El Centro was heavily used by NASWI for FCLPs in the past (e.g., FOIA data: ~6,000 operations in 2015), is a superior to Ault Field and the OLF for FCLP training, and that budgetary considerations were the reason for transitioning operations to the OLF (GRR00121559).



**Table 1.** Summary of the number of FCLP operations conducted at the Outlying Field in Coupeville and Ault Field in Oak Harbor for the years 2015 to 2023. Numbers without footnotes are FOIA data as developed for the respective year and presented in Tables 2-5 below. ND = no data.

Year	FCLPs Outlying Field		FCLPs Ault Field		All Aircraft Operations at Ault Field	
	Projected Number of Operations	Actual Number of Operations	Projected Number of Operations	Actual Number of Operations	Projected Number of Operations	Actual Number of Operations
2015	6,120 <sup>a</sup>	6,000 <sup>b</sup>	18,282 <sup>a</sup>	25,500 <sup>b</sup>	78,987 <sup>a</sup>	ND
2016				20,184		
2017				15,188		
2018				10,867		
2019	24,100 <sup>c</sup>	19,424	5,900 <sup>c</sup>	14,688	88,000 <sup>c</sup>	ND
2020		11,004		6,550		49,267 <sup>d</sup>
2021		10,362–12,454		4,606		28,687+ <sup>d</sup>
2022		12,462–14,904 <sup>e</sup>		ND		ND
2023						

<sup>a</sup> Source: Aircraft Noise Study for Naval Air Station Whidbey Island and Outlying Field Coupeville, Washington. Wyle Laboratories, October 2004. Table 4-1.

<sup>b</sup> Estimated from Figure 4 graph in Section 106 Determination of Effect for the EA-18G “Growler” Airfield Operations at the Naval Air Station Whidbey Island Complex, June 2018.  
<https://media.defense.gov/2019/Jan/29/2002084033/-1/-1/1/ATTACHMENT%20%20-%20DETERMINATION%20OF%20EFFECT.PDF>

<sup>c</sup> Source: Final EIS, Tables 4.1-3 and 4.1-5.

<sup>d</sup> FOIA’d data for NASWI operations for 2021 and 2022 (see first two tables). The number of operations for 2022 as reported by the Navy were for January through August, so total number of operations for the year would have been somewhat higher, probably very similar to 2021.

<sup>e</sup> Estimate based on 69 days of flying at the OLF (January thru August) times the average number of operations for a day of flying in 2021 (Table 3) and 2022 (Table 4), or  $(155 + 133)/2 = 144$  operations/fly day. Hence,  $69 \times 144 = 9,936$  operations (Jan-Aug). To project the balance of 2023, in 2022 there were 2526 operations in September thru December, which if added to 9,936 for January thru August = 12,462 for the year. Using another projection method: the 9,936 Jan-Aug operations equals an average of 1,242 operations per month  $(9,936/8)$ , which then multiplied by all months (12) = 14,904 for the year.

**Table 2.** FCLP flying records at the Outlying Field (OLF) in 2020 developed from observational logging of flying action as recorded by Bob Wilbur. The number of days scheduled are from the Navy’s published weekly flight schedule [<https://cnrnw.cnic.navy.mil/News/>].

Month in 2020	Number of Days Scheduled -- Flown	Number of Days Canceled		Number of Days by Track		Approximate Number of Sessions
		Full Days	Partial Days	#14	#32	
JAN	15--8	7	2	4	2	17 to 22
FEB	13--12	1	1	3	10	11 to 15
MAR	6--3	3	0	0	3	6 to 10
APR	20--17	3	3	5	26	26 to 35
MAY	4--3	1	0	1	2	5 to 6
JUN	14--12	2	0	3	18	21 to 27
JUL	5--5	0	1	1	5	7 to 9
AUG	9--9	0	0	3	12	13 to 17
SEP	12--8	4	0	1	11	13 to 18
OCT	8--7	1	1	4	4	7 to 11
NOV	15--8	7	3	5	2	21 to 28
DEC	15-10	5	0	7	6	14 to 19
<b>TOTAL</b>	136-102	34	11	37	101	161 to 217
<b>Estimated number of operations flown in 2020 ≈ 14,688 <sup>a</sup></b>						

<sup>a</sup> FOIA’d Navy records indicated there were 133 operations per day of FCLP flying at the OLF in 2021 (Table 3 below) and 155 operations per day in 2022 (Table 4 below). The average of the two = 144, which multiplied by the number of fly days (102) in 2020 = 14,688 [Range: 13,566 – 15,810].

**Table 3.** FCLP flying records at the Coupeville Outlying Field (OLF) in 2021. The number of operations were from FOIA'd Navy records [DON-Navy-2022-005093] . Other data were developed from observational logging of flying action as recorded by Bob Wilbur. The number of days scheduled are from the Navy's published weekly flight schedule.

Month in 2021	Number of Days Scheduled-- Flown	Number of Days Canceled		Number of Days by Track		FOIA'd Number of Operations	Approximate Number of Sessions
		Full Days	Partial	#14	#32		
JAN	11--7 <sup>a</sup>	5	2	5	2	1312	8 to 12
FEB	0	--		--		0	--
MAR	9--9	0	0	4	5	848	10 to 14
APR	9--8	1	0	1	7 <sup>b</sup>	1216	17 to 20
MAY	7--5	2	1	2 <sup>c</sup>	4 <sup>c</sup>	586	10 to 14
JUN	18--16	2	0	1	15 <sup>b</sup>	2424	38 to 42
JUL	3--3	0	0	0	3	360	6 to 8
AUG	19--10	9	0	3	7	1732	38 to 42
SEP	4--4	0	0	2	2	490	6 to 8
OCT	16--12	4	0	9 <sup>d</sup>	3 <sup>d</sup>	840	11 to 15
NOV	14--9	5	0	8	1	1196	22 to 30
DEC	0	--		--		0	--
<b>TOT.</b>	<b>110--83<sup>f</sup></b>	<b>28</b>	<b>3</b>	<b>35<sup>g</sup></b>	<b>49<sup>g</sup></b>	<b>11,004</b>	<b>166 to 205</b>
<b>Operations /day of flying (11,004/83) :</b>						<b>133</b>	

<sup>a</sup> Includes 1 day flown that was not scheduled.

<sup>b</sup> Includes 1 day for which track was not known, but was assigned to predominant track, i.e., #32.

<sup>c</sup> One day of flying included both tracks #14 and #32. That day was counted for both tracks as a day of flying on each track and hence add up to 6 flying days, one over the total in column 1.

<sup>d</sup> During October there were 5 days of flying for which the track was not assigned. It was arbitrarily split for 3 days on #32 and 2 days on #14.

<sup>f</sup> In 2021 there were 110 days of FCLP practice scheduled, of which 28 days were canceled, or a cancellation rate of 25%, plus 3 partial-day cancellations.. There were 83 days of actual practice composing a rough estimate of 166 to 205 sessions. Based on days of flying by track, about 42% of the operations were on Track #14.

<sup>g</sup> The double count for October (see footnote c) added 1 extra day to the totals in this column, which is why this column is 1 greater than the total in column 1.

**Table 4.** FCLP flying records at the Coupeville Outlying Field (OLF) in 2022. The number of operations for January-August were from FOIA'd Navy records. [DON-NAVY-2022-010938] Data for September to December were developed from an observational log of flying action as recorded by Bob Wilbur. The number of days scheduled are from the Navy's published weekly flight schedule.

Month in 2022	Number of Days Scheduled -- Flown	Number of Days Canceled		Number of Days by Track		FOIA'd Number of Operations	
		Full Days	Partial Days	#14	#32	#14	#32
JAN	8--3	5	0	2	1	236	196
FEB	18--9	9	1	6	3	1748	278
MAR	13--10	3	5	2	8	346	1206
APR	9--7	2	1	2	5	472	808
MAY	14--10	4	2	2	4	104	852
JUN	13--10	3	0	1	9	72	1154
JUL	Runway closed for electrical enhancement					0	100 <sup>a</sup>
AUG	Runway closed for electrical enhancement					0	0
<b>Operations totals Jan – Jun :</b>						<b>2978</b>	<b>4594</b>
<b>Both tracks combined :</b>						<b>7572</b>	
<b>Operations /day of flying (7572/49) :</b>						<b>155</b>	
The Sep to Dec operations data were not available from the foia, so instead the number of sessions flown was estimated							
SEP	13--13	0	0	3 <sup>b</sup>	10 <sup>b</sup>	--	--
OCT	1--1	0	0	0	1	--	--
NOV	14--2	12	0	4	8	--	--
DEC	6--2	4	0	1	1	--	--
<b>TOTAL</b>	109--67	42	9	23	50	--	--
<b>Estimated # of operations for Sept.--Dec. (155 ops/fly day × 18 flying days)<sup>c</sup></b>						<b>2790</b>	
<b>Estimated Total # of 2022 operations: Jan—Jun + Sept.—Dec.</b>						<b>10,362</b>	
<b>Projected Total of 2022 operations if OLF not close in July and August <sup>d</sup></b>						<b>12,454</b>	

<sup>a</sup> These operations were not scheduled.

<sup>b</sup> During September there were 5 days of flying for which the track was not assigned. It was arbitrarily split for 4 days on #32 and 1 day on #14.

<sup>c</sup> The 155 operations per fly day was the average for January through June 2022

<sup>d</sup> Added an estimated 2,092 operations to the 10,362 total to account for flying that would have occurred were the runway not closed in July and August for electrical enhancements; 2,092 was the total number of operations conducted in July and August 2021.