Explanation and Access to Sections

This web page archives a request and extensive documentation by Citizens of Ebey's Reserve to the Federal Aviation Administration (FAA) to revoke a special use airspace permit facilitating Naval Air Station Whidbey Island's use of Outlying Landing Field Coupeville (OLF) for EA-18G Growler carrier landing practice touch and go operations. Explanation and justification of the request is found in an emailed cover letter to various FAA officials and to appropriate local, state, and federal representatives.

The emailed letter to the FAA follows the links below to the 8 sections composing the justification. To open a given section or subsection click on the link below:

Section 1 (subsections 1.1 to 1.4): Outlying Landing Field Coupeville
Section 2 (subsections 2.1 to 2.2): Falsehoods and Deficiencies
Section 3 (subsections 3.1 to 3.2: Complaints
Section 4 (subsections 4.1 to 4.6): Scope and Severity of Impacts
Section 5 (subsections 5.1 to 5.4): Growler Impacts on Parks
Section 6 (subsections 6.1 to 6.2): Safety Concerns
Section 7 (subsections 7.1 to 7.7): Safety Violations at the OLF
Section 8 (subsections 8.1 to 8.3): Addenda

Email to FAA Officials on February 26, 2024

From: Citizens of Ebey's Reserve

Dear (*FAA official's went name here*),

We need your help in solving the relentless harm and trauma citizens are experiencing on historic Whidbey Island in Washington State. **More specifically, we are asking you, the FAA, to revoke Special Use Alert Area 680 OLF Coupeville.** We believe the story below and the accompanying materials will explain and validate that request.

This is a story of hope, frustration, and torment juxtaposed against the Navy's dishonesty and unchecked power. The story is about the island's beauty, its sweeping vistas and vibrant history, its endangered wildlife, and its unique historic reserve. It is about the cliffs where you can watch the orcas, gray whales, and the occasional humpback whale, and it's about the historic quaint town of Coupeville, the second oldest town in Washington State.

The town anchors the magnificent, quiet serene beauty of Ebey's Landing National Historical Reserve, the first and only such reserve in our nation. The Reserve draws visitors seeking to experience an authentic setting; its tilled fields, sheltered bays, wildlife, and quiet skies representing the best of "heritage tourism."

In the heart of that is Outlying Landing Field (OLF) Coupeville where Navy "Growler" jets (EA-18G) practice about 150 days of the year. That introduces the dark side of this story—not only of the extreme noise that Growlers inflict, but also of Navy dishonesty and betrayal.

It is about an elderly lady immobilized in bed recovering from intensive surgery during a hot summer. The Growler noise is so loud overhead that she is unable think, eat, or sleep as her house rattles and shakes hour after hour, sometimes past midnight. The constant horrific flyovers, outside at over 120 dBA (Lmax), inside at over 100 dBA, drown out use of her phone, TV, music, and even conversation.

Another chapter is about the young children playing in their yard when Growlers begin to repetitively loop over them at 500 feet or lower. Some run crying back into their home to find their parents and plead to make the pain in their ears go away. Older youngsters continue their activities unaware of the permanent damage happening to their hearing. Same for the Little League youths and their families trying to enjoy an afternoon at the ballpark while the Growlers fly 300 feet overhead, one jet every 40 seconds or less.

Just a few hundred yards from the touch-and-go practice loop, Growler noise invades Coupeville's school classrooms. Some days teaching is interrupted over

and over; student focus is lost, their cognitive learning impaired. On the same or other days youngsters doing homework experience the same disruption of focus; the noise goes on, often late, sometimes past midnight. A recent University of Washington study reports that children in Coupeville middle and high schools had a 3 to 5 month delay in learning due to the constant Growler noise levels!

Pregnant women in their homes hear and feel the rumbling, dangerous low-frequency Growler noise that penetrates their body and into their unborn. If those same mothers were in the Navy, they would be barred from working in areas of similar fetus-damaging noise intensity.

It is about folks who work at home—like the mental health counselor, the lawyer, the day-care provider, and the gardener—their livelihoods held hostage to the Navy's unpredictable, job-debilitating practices. And it is about those who have served in our military overseas and come home with PTSD only to find the jet noise re-sparking their trauma and dishonoring their service.

It is also recently about a Growler doing touch-and-goes at OLF declaring an emergency after developing an engine problem, smoke billowing from the engine. Instead of flying the normal indirect path back across marine waters to the base in Oak Harbor, the pilot flies a 10-mile straight line to Ault Field at the base. The emergency flight takes the jet at a very low altitude over the transit center's above-ground fuel storage tanks, the town of Coupeville, and from there over areas of the city of Oak Harbor. That direct path puts homes, schools, businesses, government buildings, and the hospital in jeopardy and creates intense fear in the citizens who observed it, all because the OLF runway is too short for Growler landing and takeoff.

And it is about community discord, one group arguing, "If you don't like it, just move." But a community cannot just up and move, albeit some residents do—frequently! The flow in and out of our community is dysfunction. As one nurse who had moved here from South Carolina explains while moving out of her rental home after several months under the jets, "I wouldn't live here if rent was free!"

But with housing tight, residents from all walks of life find it difficult to relocate away from the noise; the cost and heavy physical and emotional burden of an imposed relocation creates deep resentment and anger.

In fact, the residences under the jet loop far exceed the legal definition of "*unfit for human occupation*." Air Force personnel cannot work in areas with noise levels exceeding 115 dB, unless with hearing protection, yet Coupeville children playing outdoors are exposed to over 120 dB, loud enough to inflict permanent hearing damage . What is a responsible citizen to do? —Report the parents to child protection services? Report to the Navy perhaps? But the Navy accepts no responsibility; instead it passes the buck to Island County to fix it, to do something. But the County can't move the Growler practices elsewhere, nor can it shut down a community of thousands.

Our story concludes with our serene Ebey's Reserve shattered by Growler noise destroying the peace and serenity of this unique historical reserve. Tourists complain. How many have their experience ruined and leave with a soured take-home opinion to be shared with others? What is the cost in lost tourism income and impact on local businesses?

However, there is also a parallel legal action story of Whidbey Island citizens and the Washington State Attorney General joining to resolutely seek to upend the Navy's apathy. Although the Court found the Navy in violation of four environmental requirements, the Navy shows no genuine interest or intent to work cooperatively towards remedy. Instead of protecting their countrymen, women and children, the Navy silently writes them off, boldly rationalizing that its preference of a training location trumps its collateral damage.

The attached document, "Not in Anyone's Backyard", contains the Executive Summary with links to the full document and details the levels of extreme noise, legal history, citizen complaints, human health impacts, safety hazards, and effects on our children at home and in the classroom. It also addresses the Navy's

deception and its violations of laws, Department of Defense operations criteria, and FAA rules and executive orders.

We invite you to review this document to better understand the sheer magnitude of the US Navy's dishonesty and disregard of harm and of its attempts to mislead affected citizens, circumvent FAA requirements, and manipulate its legal obligations.

While the FAA may have no jurisdiction over military flights, it does have authority to establish and approve Special Use Airspaces (SUAs). That includes the permit for Alert Area 680, which facilitates Navy use of OLF Coupeville for carrier landing training flights. Hence, the FAA has the authority to revoke that permit. Revocation, we submit, is appropriate given the severe impacts and because other safer and far more suitable training venues do exist. **We therefore ask the FAA to stop the Navy's use of OLF on Whidbey Island for Growler training flights by revoking Special Use Alert Area 680 OLF Coupeville**.

Your thoughtful consideration and support of our request—i.e., to close out Alert Area 680—is deeply appreciated.

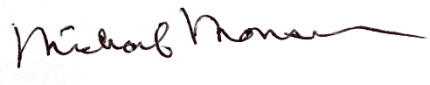
Sincerely,

Robert Wilbur, Chair
Citizens of Ebey's Reserve (COER)
bbwilbur@frontier.com
360-678-4850

Citizens of Ebey's Reserve, Board Members

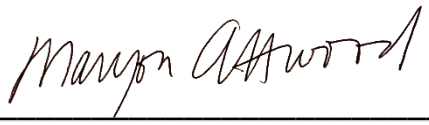
Robert Wilbur, Chair

Kenneth (Pat) Waters



Michael Monson

Paula Spina



Maryon Attwood

Mark Helpenstell

Intended Recipients of COER Request of the FAA

FAA (Prime Recipients)

Michael Whitaker
FAA Administrator

Grady Stone
NW Mountain Region Regional Administrator

Justin Biassou (206-231-4202)
FAA NW Mountain Region Noise Ombudsman

David Boulter
FAA Administrator, Aviation Safety

Donald Scata
Manager, Noise Division (AEE-100)

Krystyna Bednarczyk
Environmental Policy Advisor, Environmental Policy Division (AEE400)

Federal Executives

The Honorable Pete Buttigieg
Secretary of Transportation

WA Elected Officials

Governor Jay Inslee
Office of the Governor

Bob Ferguson
WA Attorney General

Senator Patty Murray

Senator Maria Cantwell

Representative Rick Larsen
WA 2nd Congressional District

Representative Adam Smith
WA 9th Congressional District

Representative Derek Kilmer
WA 6th Congressional District

Island County Elected Officials

Senator Ron Muzzall
10th Legislative District

Representative Dave Paul
10th Legislative District

Representative Clyde Shavers
10th Legislative District

Janet St. Clair
Commissioner, District 3

Jill Johnson
Commissioner, 2nd District

Melanie Bacon
Commissioner, 1st District

Others

Tammy Duckworth
US Senator for Illinois

Rob Smith
Regional Director of NPCA's Northwest Regional Office

Diana Dupuis
Director of the Washington State Parks and Recreation Commission

Lauren Jenks,
Assistant Secretary, Wa Dept of Public Health

Washington State Board of Health
Whidbey Camano Land Trust

Whidbey Environmental Action Network (WEAN)

The Trust Board of Ebey's Reserve