Citizens of the Ebey's Reserve
For a Healthy, Safe and Peaceful Environment
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Memorandum:

TO: Island County Planning Commission and the Board of Island County Commissioners

FROM: Citizens of Ebey's Reserve
DATE: July 14, 2025

SUBJECT: Comments and Recommendations for Island County's Comprehensive Plan Update & County Action

BACKGROUND

The Board of County Commissioners (BOCC) recognizes five Guiding Principles, the first being to "*[p]rovide for the long term health and safety of the people, the economy and our natural resources*."[1] Numerous contemporary studies have affirmed the link between noise and detrimental health outcomes, e.g., this 2022 study reporting that "*noise pollution not only drives hearing loss, tinnitus, and hypersensitivity to sound, but can cause or exacerbate cardiovascular disease; type 2 diabetes; sleep disturbances; stress; mental health and cognition problems, including memory impairment and attention deficits; childhood learning delays; and low birth weight.*[2]"

Island County residents are acutely aware that military jet noise is a significant health and well-being problem. For example, a 2015 survey of Island County residents found that aircraft noise (which is almost all Growler noise) was the highest or within the top 3 daily or health challenges[3]. Similarly, in a 2021 survey by the town of Coupeville examining livability in central Whidbey,[4] one of the questions asked was "What are you most concerned about for Coupeville"? The top concern was the impact of military jet noise. And a 2025 survey

1 https://www.islandcountywa.gov/226/Board-of-Island-County-Commissioners
2 https://magazine.hms.harvard.edu/articles/noise-and-health
3 https://www.islandcountywa.gov/DocumentCenter/View/4106/2015-Island-County-Community-Health-Survey (pages 23–27 and 39).
4 https://townofcoupeville.org/wp-content/uploads/2022/01/Workshop-Presentation-Slides.pdf (see page 4).

conducted by Whidbey Environmental Action Network found that "82.39% said they were very or somewhat concerned about Navy aircraft noise[5]."

Jet noise, especially high decibel, low frequency jet noise associated with repeated low-level Navy jet training activities (especially including field carrier landing practices "FCLPs") must be taken into account when updating the Island County Comprehensive Plan. If Island County's growth goal in the Comprehensive Plan is to accommodate the growth of residential and commercial development on Whidbey Island, then two factors must be considered:

> (i) any additional growth designated for areas subject to harmful levels of jet noise (in particular Central Whidbey) would subject residents to dangerous noise levels not in keeping with the County's obligations to protect the health, safety and well-being of its residents; and
>
> (ii) retention of existing housing stock in dangerous noise areas (e.g., the Admiral's Cove development) is at risk, making meeting the County's growth goals even more difficult. This is particularly important because significant stocks of the existing affordable housing is in Admiral's Cove and other areas subjected to dangerous noise levels.

The County cannot continue to ignore the impacts of military aviation noise over large swatches of Whidbey Island and hope to meet growth goals. The retention of existing housing and anticipated growth cannot be sustained so long as the Navy maintains its current training levels.

Citizens of Ebey's Reserve (COER) was formed in 2012 to advocate for Whidbey Island citizens and the environment detrimentally affected by Growler noise. Subsequently realizing that residents in the areas beyond Whidbey Island were also impacted, COER organized and brought those groups together as a consortium forming Sound Defense Alliance (SDA). Through our years of work with affected residents and communities; local, state, and federal elected officials; the Federal Aviation Administration and Occupational Safety and Health Administration; the Washington Department of Health; and environmental attorneys seeking solutions through the legal system, we have garnered extensive and unique knowledge we believe important to provide here as a resource with regard to Island County's Comprehensive Plan update as well as the County's Community Health Improvement Plan (CHIP) update with regard to the impacts of military jet noise.

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5 https://www.whidbeynewstimes.com/news/survey-responses-shape-comprehensive-plan-update/

Given the current state of scientific enlightenment on noise and human health and the County's charge to protect the well-being of its citizens, the time has come for the County to act on the Growler noise problem. In February and March, COER met with Commissioner Janet St. Clair to explore options and feasibilities of actions within the County's authority and responsibility that can be brought to bear on that problem.

The purpose of this report is to provide an analysis of the problem and a synthesis of actions the county can take in updating the Island County Comprehensive Plan to mitigate the serious impacts of Growler noise upon the health and wellbeing of its citizens.

Many of the potential actions noted below involve negotiation with the Navy and the exercise of persuasive influence. As such, not all actions are expected to advance or be particularly successful. County action, however, will assure impacted constituents that the County is actually trying to address the harm being done to its citizens.

FINDINGS OF FACT

(Myth versus Reality)

1. Recognition of the Noise Problem

In years past, Island County government has avoided acknowledging that military jet noise was a problem, in part because science had not quite coalesced around a conclusion. That is no longer the case. That gave rise to noise-deniers and patriotic slogans, like "The Sound of Freedom" and "Jets = Jobs."

The contemporary reality, however, is that Jet Noise = Harm. The world's scientific consensus today is that noise from jet aircraft, and in particular military jet aircraft, is indeed harmful to humans. This is no longer debatable. In 2024 the University of Washington Department of Environmental & Occupational Health Sciences completed a noise study specifically looking at the health impacts associated with the EA-18G "Growler" on Whidbey Island. The definitive findings of that study have been peer reviewed and published.[6] This study identified significant noise-related health risks for over 72,000 people in the region of Naval Air Station Whidbey Island (NASWI).

An even more recent 2025 publication revealed that "*[s]trong, consistent exposure-response patterns...were found for most health impacts, perceptions, and concerns. The likelihood of adverse impacts...was greatest in respondents exposed mainly to military aircraft*."[7]

6 See https://www.nature.com/articles/s41370-024-00670-1

7 See https://www.nature.com/articles/s41370-024-00737-z .

The Comprehensive Plan must acknowledge and reference the scientific consensus that military jet noise is harmful to the health and well-being of county residents.

2. Stop pretending the county has no authority over the Navy

County government has been avoiding the jet noise issue, both on health and on childhood learning impacts, by rationalizing that the county has no legal authority over the U.S. Navy. Although technically true, it belies that the county has moral and persuasive authority, and that it can and should take policy positions on the issue. By refusing to acknowledge the problem, and by not establishing policy positions calling for the amelioration of the problem, the county becomes complicit in the harm being done by the Navy. Furthermore, the county gives the Navy a safe harbor to continue harming the residents of Whidbey Island when it does not use its *politically persuasive authority* to demand action and solutions. Whether or not the county government can compel the Navy to do anything is not the point. The county can and should take a stand on behalf of protecting the health and well-being of its residents, which is its self-admitted primary responsibility.

3. "Who was here first" and "Do Navy economic contributions do not justify continuing to turn a blind eye to the health impacts of Growler noise"?

Two of the main arguments made in support of supporting Growler training over civilian areas of Whidbey Island, and Island County in general, are that: (i) the Navy base was here first; and (ii) the Navy is the single largest contributor to the county economy. Both of these arguments are subject to dispute.[8] Regardless, for purposes of protecting and promoting public health in Island County these arguments are little more than *red herrings*. Whether validated or disputed, neither argument justifies the county's failure to examine, report, and act to mitigate the impacts and harms upon the public health and well-being caused by Navy jet noise.

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8 For instance, the plat for the Admirals Cove subdivision was recorded with Island County before the Navy ever flew the first jet aircraft at the OLF. Moreover, in July 1963 when the subdivision plat was recorded the Navy was selling off outlying fields around the region and offered to transfer the Coupeville OLF to Island County. Accordingly, a valid argument can be made that Admirals Cove predated Navy jets.

Similarly, the amount of the Navy's economic contribution to Island County has always been factored in terms of total Navy payroll at NASWI. An independent economic analysis was conducted by Michael H. Shuman in February 2017 (Shuman, M.H. 2017. The Hidden Costs: the $127 Million Dollar Price Tag for NASWI; at https://citizensofebeysreserve.com/wp-content/uploads/2025/05/Invisible-Costs_by_Shuman-1.pdf). That study clearly showed that a valid economic benefit analysis of the Navy's presence on Whidbey is much more complicated. In reality, there has never been a comprehensive analysis performed to date of the benefits and detriments associated with the Navy presence on Whidbey Island.

County government has an absolute obligation to its residents to be open and honest about Growler health impacts. Even if every single resident had moved here after the Growlers started training at the OLF; or even if 100% of the county economy came directly from the Navy, the county would nevertheless have a fundamental obligation to its citizens to be honest about the health impacts and costs, to discuss them publicly, and to try to do whatever it could to mitigate them. Ignoring the problem so as "*not to rock the boat*" is a failure of government. Failing to notify the public of the extent of the problem actively contributes to and exacerbates the harm. Island County must fulfill its obligations to inform and take all possible steps to protect the people.

Specifically with regard to the Comprehensive Plan update, Island County government needs to amend its zoning code to move residential and commercial growth away from areas most severely affected by Growler noise. It was a mistake to build the County's bus terminal adjacent to the runway at the OLF and directly under Track 14 landing operation and within a stone's throw of the Track 32 takeoff. The County must ensure that no similar planning mistakes are made and should even seriously consider relocating the bus facility, given the above ground fuel storage tanks. Similarly, residential development continues around the OLF. The County must meet its primary charge—protecting its constituents—and discontinue residential housing development in toxic noise areas and APZs.

Mandating increased noise-damping design features in homes is not sufficient. Sound reduction does not reduce Growler flyover noise to safe levels. Reductions to 110 decibels (or even 90 decibels) indoors still leaves residents exposed to dangerous levels. Importantly, people do not just inhabit the inside of their homes. They are camping or watching the ball game at Rhododendron Park, swimming at the outdoor pool at Admirals cove, walking the numerous trails under the flight track. They have a right to live rather than being house-bound. Sound-reducing homes helps but is far short of a solution.

4. State Noise Laws apply to Island County

WAC 297-817 requires the county, as an employer, to protect workers by determining noise exposure levels and, if over threshold, requires the posting of noise-warning signage, mandating the use of hearing protection, and complying with a variety of other health related safeguards.[9] Island County workers currently perform outdoor jobs[10] which directly expose them to hours of Growler noise in excess of state law. Although many of these jobs and workers cannot be relocated away from Growler noise, this does not relieve the County of its

9 https://app.leg.wa.gov/wac/default.aspx?cite=296-817-20020

10 Cf. Coupeville recycling and transfer center; Island County bus barn.

obligations under state law to protect its employees. Neither is the County relieved of its obligations because the harm is caused by the actions of a federal agency – the Navy. Island County has an absolute duty to comply with Washington State law and to protect its employees.

Analogously, the same protections afforded to county workers by Washington State law should also be applied by the county, where appropriate, to all of its residents and visitors. The value of Island County's children, residents, and visitors is no less than that of its workers. Taking no protective action is not an option. Many county-owned public areas[11] regularly expose users to Growler noise levels that, with short exposure times (a few overflights), can permanently damage hearing. Failing to warn and protect the public from this danger is another failure of the County government.

Island County is a constitutional agent of Washington State, and as such is obligated to comply with and enforce state laws.

4. Health and Learning Impacts upon Children

Coupeville's elementary, middle and high schools, as well as a large daycare center, are located in close proximity to Growler training paths exposing children to dangerous Growler noise levels. After-school activities located at Rhododendron Park increase dangerous noise exposures as well. Today it is well-documented that excessive noise exposure while at school, at home, or at play reduces cognitive learning and interferes with concentration.

Recent studies reveal wide-ranging impacts of aircraft noise on human health, which often affects mental acuity and learning in adults and children. Viet et al. (2014) present a strong review of the literature regarding health impacts of noise on children. They assume that vulnerability to hearing loss in children is similar to that of adults but found no studies of support. In addition to hearing loss, they report that "*noise exposure is associated with negative birth outcomes, reduced cognitive function, inability to concentrate, increased psychosocial activation, nervousness, feeling of helplessness, and increased blood pressure in children.*" (Abstract)

Noise studies reveal young children are particularly at risk from noise. Hahad et al. (2025) examined compelling and conclusive findings on the detrimental effects of noise on the brain and mental health, which confirm that exposure to noise, particularly from sources such as traffic, can harm the central nervous system. Those harms are manifest as depression, anxiety, suicide, and behavioral problems in children and adolescents. The investigations point to "*direct adverse phenotypic changes in brain tissue by noise (e.g. neuroinflammation, cerebral oxidative stress), in addition to feedback signaling by remote organ damage, dysregulated immune cells, and impaired*

11 E.g. Driftwood, Rhododendron, and Patmore parks.

circadian rhythms, which may collectively contribute to noise-dependent impairment of mental health."

Noise studies in aggregate reveal young children are particularly at risk from noise. Hahad et al. (2025) examined compelling and conclusive findings on the detrimental effects of noise on the brain and mental health, which confirm that exposure to noise, particularly from sources such as traffic, can harm the central nervous system. Those harms are manifest as depression, anxiety, suicide, and behavioral problems in children and adolescents. The investigations point to "*direct adverse phenotypic changes in brain tissue by noise (e.g. neuroinflammation, cerebral oxidative stress), in addition to feedback signaling by remote organ damage, dysregulated immune cells, and impaired circadian rhythms, which may collectively contribute to noise-dependent impairment of mental health.*" Addressing the impacts of noise on fetal development, they report a number of health harms from noise.

> Chronic maternal exposure to airport noise during pregnancy has been shown to result in vasoconstriction which subsequently leads to decreased utero-placental blood flow, and possibly increased fetal hypoxia [24]. The stress of chronic elevated noise can lead to increased maternal blood pressure, greater secretion of maternal epinephrine and norepinephrine, and decreased human placental lactogen [24,25]. Exposure of pregnant women to airplane noise has been associated with a decrease in body weight of newborn babies; and the height of 3-year-old children was shown to be significantly decreased with higher noise levels [25]. Human fetal exposure to noise has been linked with decreased birth weight and length, and increased incidence of birth defects, specifically cleft lip, cleft palate, anencephaly and spinal bifida [24,26,27]. (p. 4; numbers are references)

They further report that noisy environs have been linked to non-auditory health effects in children that include, "*reduced cognitive function, inability to concentrate, increased psychosocial activation, nervousness, and helplessness [23,26,35]...an increase in stress [36]*[,]*... a small but positive relationship between aircraft noise exposure and blood pressure...[, and] a stronger positive relationship with systolic blood pressure* [for highway noise]....(p. 4; numbers are references).

Specific to the NASWI Growler noise in the greater Whidbey Island area, a 2024 University of Washington study (Jacuzzi, G. et al. 2024) reported on health and educational impacts. It determined that Growler noise:

- Poses a substantial health risk and impact on 74,316 Washingtonian adults and youths being routinely *"exposed to noise levels associated with adverse health effects*."
- Exposes nearly 12,500 residents to average noise levels incompatible with residential land use per regulations set by the Navy, FAA, and HUD,
- Is so loud in one community near Outlying Field Coupeville that just seconds of exposure can cause "*direct, acute mechanical damage to the inner ear*."

- Jeopardizes the health of nearly 85% of residents of the Swinomish Indian Tribal Community, Swinomish Reservation.
- Exposes numerous schools to noise levels known to interfere with student and teacher conversation and comprehension (not to exclude homework time).
- Can activate stress hormones, which after prolonged exposure, heightens health risks, like cardiovascular and mental health issues.

A study of over 1.4 million children born between 1986 and 2008 showed increased risk of hearing dysfunction for those whose mothers were exposed to noise levels of 85 dB during their pregnancy (Selander 2016). The military does not allow pregnant women to work in such locations yet has taken no action to protect citizens as collateral jet noise damage. Extreme noise has been found to decrease birth weight (Selander et al. 2019) and create pregnancy complications that can increase the risk of preeclampsia, i.e., serious health problems for the mother and infant (Wang et al. 2022). Additional studies revealing impacts of noise on children's health and wellbeing and, hence ability to learn, are presented in Appendix A.

5. Air Quality and Electromagnetic Exposure Levels

There are additional dangers to the health and well-being of Whidbey Island residents from low-level Navy jet training. In addition to the risks associated with a Growler crash, Whidbey Island residents are also exposed to jet aircraft exhaust and Growler electromagnetic radiation. Neither of these sources of potential toxic contamination have been tested or studied at the OLF or at Ault Field. Nevertheless, air pollution and radiation exposure are both generally acknowledged in the scientific and health communities to be harmful to human health. Pending scientific study and analysis specific to Growler emissions, Island County should at least alert the public to the potential danger.

WHAT SHOULD ISLAND COUNTY DO TO ADDRESS THESE CONCERNS

Initiate Problem-Solving Negotiations with the Community and Navy

The County should ramp up proactive discussions on the noise problem with the Navy and impacted stakeholders. The Navy needs to be confronted with the harms it is inflicting. The County's charge demands they confront the Navy forcefully and realistically about those harms, and that reduced FCLP training at Ault Field and the OLF is the only realistic solution. It is not sufficient for the Navy to listen to the problem and do nothing about it. Rather, the Navy needs to be the "good neighbor" who cares enough to find and use alternative FCLP training venues that would bring noise levels down to habitable levels on Whidbey (and allow

other parts of the country to share the patriotism of living with FCLPs). Specific Actions the County should take:

1. Given the county's duty to protect its citizens and visitors, the Comprehensive Plan needs to acknowledge the relationship of jet noise to harms to health and well-being and thereby establish a basis and justification from which to advance strategies that can reduce the detrimental impacts in terms of development.

2. The County should lean on the Navy to diminish FCLP operations at the OLF by redistributing them to other airfields. The goal should be to bring noise levels down at the OLF to levels that comply with the military's own thresholds for acceptable residential use.[12]

   The Growth Management Act requires the County to increase residential density. However, at current Navy training levels, it will be impossible for the County to meet its growth goals in noise zones that are unfit for human habitation (specifically, the areas impacted by Growler noise),

3. Due to the proximity of OLF track #32 to Coupeville schools, the county should urge the Navy not to fly FCLPs on runway #32 when schools are in session.

4. Install sound insulation at Coupeville and Oak Harbor schools significantly affected by Growler noise or not fly when school is in session.

5. Encourage the Navy not to flying during hours that youths are engaged in activities outside the school buildings.

6. Work with the Navy to limit night operations to 2 hours after sunset to provide quiet needed for students with homework and, to ensure proper sleep, eliminate flying after 11:00 pm.

7. Pressure the Navy not to fly at the OLF during scheduled youth events at Rhododendron Park.

8. Come into compliance with all Washington State laws regarding the protection of employees, and in particular with exposure to noise laws and regulations.

12 Section 7 in, https://media.defense.gov/2022/Apr/18/2002978898/-1/-1/1/NASWI%20AICUZ_FINAL_29JAN2021.PDF

9. Mirror for residents and visitors the protections Washington State law affords Washington workers. At a minimum, post factual warning signs at all public places where noise levels can exceed 100 decibels, including schools, Keystone Hill Road, Rhododendron Park, etc., to protect uninformed adults and children.

10. Urge the Navy to provide real time FCLP flight information to help folks avoid at least some exposures and unnecessary disruption (see **Appendix B**). At NAS Patuxent the Navy realizes the problems FCLPs create and has taken steps like those suggested here: "FCLPs are [are] limited to 45 minutes and we typically schedule only two periods per day....Also, whenever we conduct FCLPs, we try and get the word out to the surrounding communities to keep them aware of our operations, especially those that are not routine to NAS Patuxent River." [https://www.navair.navy.mil/node/6056]

11. Strongly request the Navy limit its night operations to 2 hours after sunset to protect against sleep disturbance.

12. Develop air quality data and strongly urge the Navy to cease low-level flight operations during air quality alerts, e.g., during summer fire smoke alerts.

13. Lobby Washington's congressional delegation to compel the Navy to do a bona fide air quality analysis of the areas subjected to Growler training. Similarly, lobby the delegation to require the Navy to hire an independent contractor to perform a bona fide study of the electromagnetic radiation levels at homes around the stationary emitter at the OLF.

14. Install Navy "purple" air monitors at the OLF and at Ault Field to continuously monitor air quality in populated neighborhoods.

15. Importantly, the County could host regular meetings between the Navy, County health officials, Whidbey Environmental Action Network, SDA, and COER to share information, monitor progress, and consider helpful suggestions aimed at achieving effective mitigation.

Establish Persuasive Negotiations with the Navy

While the County cannot legally make the Navy do anything it does not want to do, it can remind the Navy that the County's consistent support rests largely with the Navy showing itself to be the good, truthful, and well-meaning neighbor it proposes itself to be.

If the County advances that forthrightly, forcefully, and in compliance with its charge to protect its citizens from harm, then all the specific recommendations for interactive negotiations with the Navy addressed above become credible and worth the County's vigorous pursuit.

Controvert the Need for APZs

The threshold calling for establishment of an accident potential zone (APZ) is 10,000 landing or takeoff operations for a given runway or 5000 FCLP loops (each loop = 2 operations = 1 landing + 1 takeoff). While the County has not yet adopted the Navy's recommended APZs for the OLF, presumably to not thwart residential development there, it does not change the reality that the Navy's planned number of operations will exceed the APZ-1 threshold; that is, the risks are the same either way.

However, since 2018, when the Navy decided to move most of the FCLPs from Ault Field to the OLF, the Navy has not yet surpassed the APZ threshold at either of the OLF's two runways (14 or #32) (see **Appendix C**). As derived from FOIA records, the split between runway #14 and #32 in the past few years has been closer to 50:50 than the 30:70 split envisioned in the EIS. If the Navy conducts 20,000 or more operations at the OLF (24,000 are planned), an even split would mean both runways would surpass the APZ threshold. Another uncertainty is that the annual 10,000 FCLP loop threshold for a given runway may be only intermittently exceeded (as opposed to routinely), which further expands the question of whether APZs are necessary at the OLF.

Based on the 2020 census, at the OLF about 4000-5000 residents would be in the APZs (~2000-2500 for each OLF runway) were they declared in zoning law. The residences would become non-conforming uses, and undeveloped land would presumably be precluded from residential development.

Establishing APZs would 1) reduce values of properties in the APZs and shift that tax shortfall to other county residents, 2) further constrict development space for an expanding population, and 3) put directly in harm's way suburban-density neighborhoods the County is sworn to protect. The CPU should flag these real problems to the Navy as issues that demand serious attention and cooperation to redistribute its FCLPs to levels below the APZ threshold.

If the APZ operations threshold is to be routinely exceeded at either or both OLF runways, then the County should seek accurate information from the Navy. That is, both the APZs and FCLP flight paths as mapped for the EIS are inaccurate. That is, the Navy has ignored Department of Defense Instruction, number 4165.57, which calls for taking multiple flight paths into account

when determining APZ boundaries. There are three flight tracks for both runway 14 and 32 at the OLF, but the Navy unrealistically based its APZs on a single centered flight path instead of multiple paths. It also derived its APZs on flight paths that do not depict their actual location; i.e., they all understate the actual patterns which are invariably wider than depicted in the FEIS (page A4-30). As fully explained in **Appendix D**, the real APZ boundary for runway #32 will be much wider than now depicted, extending to or overlapping Coupeville's high school and a large daycare center.

This concerning manipulation of real risk factors should be interrogated with the Navy, and the APZ map (page A4-30) should be updated to reflect actual tracks used, APZs based on the widest and narrowest tracks (not an out-of-compliance midline). Once done, the County's Icegeo Map should be updated to include the option of examining the APZs superimposed over the properties, residences, and businesses.

Recognize and Forthrightly Confront the OLF Safety Risks

As revealed in FOIA information that COER has obtained, Growler incidents are not rare events and will continue to happen. And the risks go up with the OLF being the training ground for new pilots:[13]

> Four incidents were related to pilot error. One incident occurred during FCLP training when the pilot incorrectly reduced power during a climbing turn at approximately 500 feet AGL. This resulted in an incipient stall. Stalls at 500 feet are essentially unrecoverable....Growler pilots' range in experience from battle hardened veterans of multiple deployments to newly minted pilots. Their training is continuous and rigorous. These dedicated volunteers deserve a training range where they aren't flying at 500 feet over schools, homes, and businesses.
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> Four incidents involved Air Traffic Control (ATC) errors or confusion. One of the four occurred in Iraq and is not relevant to operations at Naval Air Station Whidbey Island (NASWI). However, the other three occurred at NASWI. In the most egregious case the controller was handling four aircraft, including one declared emergency, while field carrier landing practice was taking place simultaneously. This resulted in two aircraft executing hard turns left and right to avoid a midair collision with a third aircraft that the controller had incorrectly reported to be two miles away and holding. [14]

13 From https://citizensofebeysreserve.com/wp-content/uploads/2024/02/SECTION-6-MASTER-Pat-Waers.pdf
14 From https://citizensofebeysreserve.com/wp-content/uploads/2024/02/SECTION-6-MASTER-Pat-Waers.pdf

Regardless of whether or not APZs for the OLF are established and codified in zoning law, the fact is that there are unique and significant incident risk problems at the OLF that increase the likelihood and potential magnitude of damage and harm. Those unique and irresolvable issues for the OLF include the following[15]:

1. The runway is too short for emergency landing when wet, making the protocol in the event of an emergency to try to fly the most direct route back to Ault Field, taking the at-risk jet over the top of Coupeville homes and properties north and west of Penn Cove. Recall the May 23, 2022 incident.[16]

2. In violation of DOD's Unified Facilities Criteria, two roads intrude into the clear zone and SR 525 intrudes into the primary surface. And there are a significant number of unallowed obstructions (cement barriers and trees) in the clear zone. These violations should have been addressed and resolved during the transition to Growler use.

3. High bird strike risks exacerbate the crash risks. The Navy acknowledges that most bird strikes occur at an elevation of less than 1,000 feet. Hence, to reduce strike risks the FAA and the military recommend that airfields be situated at least about 2 miles from agricultural fields, landfills, marshlands, and other areas where birds concentrate. Ignoring that guidance, the low-elevation flight pattern (500 to 1000 feet) takes the Growlers directly over agricultural fields and a major marshland sanctuary, both heavily used by waterfowl, gulls, and harriers year-round.

4. Although Coupeville's elementary, middle, and high schools, as well as a large daycare center, are not technically within, the APZ, they do lie just 600 yards from the APZ-1. The Oceana F-18 crash that hit a Virginia Beach apartment building in 2012 was just outside the APZ. This video[17] of the recent Growler crash in San Diego Bay during an FCLP operation gives pause to question—what if that was Coupeville's high school instead?

The above-noted risks associated uniquely with the OLF call for responsive and responsible action by the County. The County needs to explain to the Navy that the safety shortcomings at

15 From: https://citizensofebeysreserve.com/wp-content/uploads/2024/02/Section-7-MASTER-Pat-Waers.pdf

16 https://www.whidbeynewstimes.com/news/growler-malfunction-over-whidbey-raises-concern/

17 https://www.msn.com/en-us/news/us/fighter-jet-crashes-into-san-diego-harbor-2-pilots-rescued/ar-AA1yVkvW?ocid=BingNewsSerp

the OLF and the proximity of residences under and adjacent to the FCLP flight track are not acceptable and demand a significant reduction in operations flown there. Due to the proximity of OLF track #32 to Coupeville schools, the County needs to convince the Navy not to fly FCLPs on runway #32 when schools are in session.

– Appendix A –

Banks, J.L., O'Rourke, B.P. 2025. Community impacts of aviation noise: a pilot survey. Journal of Exposure Science and Environmental Epidemiology 35, 80–90 (2025).

https://doi.org/10.1038/s41370-024-00737-z

In a survey of 1452 individuals, Banks and O'Rourke (2025) found, "*Respondents report experiencing loud, repetitive, low-altitude aircraft noise - day and night - causing stress and negative effects on mental and physical health. For many, "annoyance" did not adequately describe their experience. Strong, consistent exposure-response patterns for weekly flight frequency (<100 to, >1000 flights) were found for most health impacts, perceptions, and concerns. The likelihood of adverse impacts and heightened perceptions and concerns was greatest in respondents exposed mainly to military aircraft.*"

The authors concluded that, "*Aviation-impacted communities are experiencing mental and physical health impacts that extend beyond annoyance...Aviation noise policy should be updated to account for those factors and focus on reducing public health impacts and their human and economic costs.*"

Park, Je., Muennig, P.A. & Zafari, Z. 2025. Projecting the economic burden of health impacts of aircraft noise: a case study of Baltimore Washington International Thurgood Marshall Airport. Journal of Exposure Science and Environmental Epidemiology 35, 107–117 (2025).

https://www.nature.com/articles/s41370-024-00685-8

Park et al. (2025) examined the health and related economic burden related to aircraft noise over periods of 10, 20 and 30 years. Health impacts included cardiovascular disease, anxiety disorders, noise annoyance, and low birth weight associated with day-night noise levels <55 dB DNL, 55–60 dB DNL, 60–65 dB DNL, >65 dB DNL). A Monte Carlo simulation and sensitivity analysis estimated that aircraft noise exposure would produce incremental mortality costs of $362 million, morbidity costs of $336 million, and losses of 15,326 Quality-Adjusted Life Years over the next 30 years. [emphasis supplied]

Constantin Cristian Topriceanu, et al. 2025. Higher Aircraft Noise Exposure Is Linked to Worse Heart Structure and Function by Cardiovascular MRI. Journal of the American College of Cardiology. Archive, 85 (5).

HTTPS://WWW.JACC.ORG/DOI/10.1016/J.JACC.2024.09.1217

In this recent study Constantin et al. (2025) examined aircraft noise effects on the heart at four United Kingdom airports. They found frequent exposure to aircraft noise caused the muscle to grow stiffer and thicker, reducing its ability to pump blood effectively, quadrupling the risk of heart attacks or strokes. The authors concluded that "*Overall, a hypothetical individual experiencing the typical CMR* [cardiovascular magnetic resonance] *abnormalities associated with a higher Lnight exposure may have a 4 times higher risk of MACE* [major adverse cardiac events; i.e., heart attack or stroke]....*Higher aircraft noise exposure associates with adverse LV* [left ventricle] *remodeling, potentially due to noise increasing the risk of obesity and hypertension. Findings are consistent with the existing literature on aircraft noise and cardiovascular disease, and need to be considered by policymakers and the aviation industry*."

Osborne, MT, et al. 2020. A neurobiological mechanism linking transportation noise to cardiovascular disease in humans. European Heart Journal. 41 (6). pp 772–782.

https://academic.oup.com/eurheartj/article/41/6/772/5643958

Osborn (2020) examined the neurobiological mechanisms linking transportation noise with major adverse cardiac events (MACE). The authors found "*that noise exposure associates with MACE via a mechanism that begins with increased stress-associated limbic (amygdalar) activity and includes heightened arterial inflammatio*n." The amygdala influences in the brain's response to environmental stressors, like noise. Amygdala activity correlates with perceived stress and is increased in stress-related disorders.

Fink, D. 2025. What is the safe noise exposure level to prevent noise-induced hearing loss?. Journal of Exposure Science and Environmental Epidemiology 35, 124–128.

https://doi.org/10.1038/s41370-024-00660-3

Fink (2025) concludes that "*the safe noise exposure level to prevent NIHL is about 55–60 dB time-weighted average for a day. Since any temporary auditory discomfort, tinnitus, or NITTS likely indicates that permanent auditory damage has occurred, it is possible that the safe noise*

exposure level for impulse noise is also only 55 dBA. These sound pressure levels are radically lower than current occupational noise exposure recommendations, the EPA's calculated safe noise level, or any published guidance for public noise exposure."

16. Stansfeld, S., and C. Clark 2015. Health Effects of noise exposure in children. Current Environmental Health Report. 2 (2). pp 171-178.

https://pubmed.ncbi.nlm.nih.gov/26231366/

Stansfeld et al. (2015) reviews impacts of environmental noise on children and concludes that "*Environmental noise exposure, such as road traffic noise and aircraft noise, is associated with a range of health outcomes in children. Children demonstrate annoyance responses to noise, and noise is also related to lower well-being and stress responses, such as increased levels of adrenaline and noradrenaline….There is robust evidence for an effect of school noise exposure on children's cognitive skills such as reading and memory, as well as on standardised academic test scores*." [emphasis supplied]

Bigham, P.M. 2025. Neurodevelopmental costs of noise pollution–is history rhyming again?. Journal of Exposure Science and Environmental Epidemiology. 35, 34–36.

Bingham (2025) analyses decades of https://doi.org/10.1038/s41370-024-00725-3research that "*attest to the deleterious neurodevelopmental effects of excessive noise exposure in children...*[whose] *auditory perceptual skills appear to be more vulnerable to background noise compared to adults*." [emphasis supplied]

Bingham goes on to note that "*Policy-makers, scientists, and the public will first need to recognize and address the neurotoxic effects of noise on infants and children more directly*," and that numerous studies "*have documented alterations in the `normal activity' of children's nervous system due to noise, including hearing loss, impaired attention span and reading.*

Bingham further notes, *"`Natural experiment' community studies and `dose-response' associations provide strong causal evidence of noise effects on children's behavior and cognition.*"

Münzel, T., Daiber, A., Engelmann, N. et al. 2025. Noise causes cardiovascular disease: it's time to act. Journal of Exposure Science and Environmental Epidemiology. 35, 24–33.

https://www.nature.com/articles/s41370-024-00732-4

Munzel et al. (2025) reviewed past and current (post 2018) studies and meta-analyses on the adverse effects of transportation noise on health. They reported that exposure to high levels of road traffic noise over just several years lead to numerous adverse health issues, including premature deaths, ischemic heart disease (IHD), chronic sleep disturbances, and increased annoyance. The mechanistic cause was attributed to noise triggering "*oxidative stress, inflammation, endothelial dysfunction, and circadian rhythm disruptions...*[which] *involve the activation of NADPH oxidase, mitochondrial dysfunction, and nitric oxide synthase uncoupling, leading to vascular and cardiac damage.*" They further found that "*chronic noise exposure does not result in habituation, and susceptible individuals, such as those with pre-existing CVD, are particularly vulnerable*."

Hahad, O., Kuntic, M., Al-Kindi, S. et al. 2025. Noise and mental health: evidence, mechanisms, and consequences. Journal of Exposure Science and Environmental Epidemiology. 35, 16–23.

https://doi.org/10.1038/s41370-024-00642-5

Hahad et al. (2025) examined compelling and conclusive findings on the detrimental effects of noise on the brain and mental health, which confirm that exposure to noise, particularly from sources such as traffic, can harm the central nervous system. Those harms are manifest as depression, anxiety, suicide, and behavioral problems in children and adolescents. The investigations point to "*direct adverse phenotypic changes in brain tissue by noise (e.g. neuroinflammation, cerebral oxidative stress), in addition to feedback signaling by remote organ damage, dysregulated immune cells, and impaired circadian rhythms, which may collectively contribute to noise-dependent impairment of mental health.*"

Zafari, Z. et al. 2025. Different considerations in economic impacts of aircraft. Journal of Exposure Science and Environmental Epidemiology. 35, 104-106.

https://doi.org/10.1038/s41370-024-00688-5

"*The economic impacts of aircraft noise include direct costs, indirect costs, intangible costs, and non-health-related economic impacts. Were we able to precisely estimate these costs and apply them to a given airport, we would be able to provide policymakers with the magnitude of investment required to mitigate the health problems in an economically tenable way. In some extreme cases, it may be cost-beneficial to move the airport out of a city. In others, mitigation efforts such as sound insulation may be more tenable. Other solutions such as altering flight procedures and operations (e.g., changing flight paths) and technological advancements and retrofitting older planes can also help with noise mitigation.*"

Selander, J. et al. 2016. Maternal Occupational Exposure to Noise during Pregnancy and Hearing Dysfunction in Children: A Nationwide Prospective Cohort Study in Sweden. Environmental Health Perspectives. 124 (6), 855-860.

***"Conclusions** This nationwide population-based study supports the hypothesis that occupational noise exposure during pregnancy is associated with future hearing dysfunction in children. Taken together with previous epidemiological and experimental studies as well as mecha-nistic data, the available data indicate that pregnant women should not be exposed to high levels of noise at work."*

Viet, S.M., et al. 2014. Assessment of Noise Exposure to Children: Considerations for the National Children's Study. Journal of Pregnancy and Child Health. 1 (1), 1-14.

https://pmc.ncbi.nlm.nih.gov/articles/PMC4390126/#S9

Viet, S.M., et al. (2014) present a strong review of the literature regarding health impacts of noise on children. They assume that vulnerability to hearing loss in children is similar to that of adults, but found no studies of support. In addition to hearing loss, they report that "*noise exposure is associated with negative birth outcomes, reduced cognitive function, inability to concentrate, increased psychosocial activation, nervousness, feeling of helplessness, and increased blood pressure in children.*" (Abstract)

Addressing the impacts of noise on fetal development, they report a number of health harms from noise.

> *Chronic maternal exposure to airport noise during pregnancy has been shown to result in vasoconstriction which subsequently leads to decreased utero-placental blood flow, and possibly increased fetal hypoxia [24]. The stress of chronic elevated noise can lead to increased maternal blood pressure, greater secretion of maternal epinephrine and norepinephrine, and decreased human placental lactogen [24,25]. Exposure of pregnant women to airplane noise has been associated with a decrease in body weight of newborn babies; and the height of 3-year-old children was shown to be significantly decreased with higher noise levels [25]. Human fetal exposure to noise has been linked with decreased birth weight and length, and increased incidence of birth defects, specifically cleft lip, cleft palate, anencephaly and spinal bifida [24,26,27]*. (p. 4; numbers are references)

They further report that noisy environs have been linked to non-auditory health effects in children that include, "*reduced cognitive function, inability to concentrate, increased psychosocial activation, nervousness, and helplessness [23,26,35]...an increase in stress [36]*[,]*... a small but positive relationship between aircraft noise exposure and blood pressure...[, and] a stronger positive relationship with systolic blood pressure* [for highway noise]....(p. 4; numbers are references).

– Appendix B –

Soundoff Published in Whidbey News Times, August 2023

As many know, Citizens of Ebey's Reserve (COER) and Washington's Attorney General sued the Navy over its failure to meet the requirements of the National Environmental Policy Act. The judge found against the Navy on four counts and ordered the plaintiffs and the Navy to negotiate interim remedies to be in effect until a revised EIS is put in place. The Navy has rejected all remedies suggested by COER.

The extremely loud carrier land practice sessions ignite trauma in veterans with PTSD, compromise at-home businesses, interfere with youngsters doing homework and diminish their cognitive function, aggravate dissociative reactions in autistic children, and diminish and intimidate at-home livability to such an extent that many have been forced to relocate, creating dysfunctional turnover neighborhoods.

One remedy COER suggested was to provide real-time information on carrier landing practice—that is, for a given day, Navy would inform, once determined, on the runway flight path to be used and how many practice sessions would occur at what time of day and with how many jets (1 to 5). If initiated, that would enable residents to consider ways to avoid at least some of the noise-debilitating practice sessions. COER's request was similarly reiterated in a letter from Sound Defense Alliance to base commander Captain Hanks.

The Navy rejected those requests, as explained in a March 10, 2023, response from Captain Hanks: "*Detailed flight information...could reveal national security vulnerabilities,* [which] *...would likely disrupt, destroy or damage operations, property, or facilities, and pose an unacceptable risk to men and women in uniform*….[O]*ur adversaries can use detailed flight information, when aggregated, to assess Growler readiness and...inflict significant harm*."

More bark than bite, his explanation appears strained and without substance. That is, anyone on the ground by simple observation can easily tally and aggregate actual landing practice data and provide that to whoever. If our men and women in uniform can actually be put in jeopardy by aggregating observable practice flights, then to protect them those practices needed to be moved to a non-public venue. That argument is a red herring.

But really, what possible benefit can an adversary gain by knowing a few hours ahead of time which of two flight patterns will be used when in just a few more hours all that and more become self-evident through simple observation?

Captain Hanks further contended that real-time information cannot be revealed because the flight operations have many variables that make practices "fluctuate" from the weekly schedule. However, the inaccuracy of the schedule is exactly the problem that real-time information would fix. So here too, that argument is cockeyed.

The schedule inaccuracies compromise “work-around” planning for residents. This past January to June, 93 out of 130 weekdays (72%) were scheduled for practice at the OLF, but about 20% of the flying was canceled. When residents, who arranged their day to avoid the jets, often at great inconvenience, subsequently discover that flying was canceled, it naturally foments anger, frustration, and resentment. Real-time information would mitigate that. Even changes posted just a few hours ahead of flying would enable residents to attempt to adjust their activities accordingly, if they can.

This small and doable ask of the Navy would benefit many trying to live and cope with the jets. The Navy’s nonsensical rejection of the request raises serious questions as to their motive(s) and taints their self-promotion as a “good neighbor.” The Navy should reconsider.

– Appendix C –

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 2024. Numbers without footnotes are Freedom of Information Act 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[a]		18,282[a]	25,500[b]	78,987[a]	ND
2016		6,000[b]				
2017		5,804		20,184		
2018		6,920		15,188		
2019	24,100[c]	19,424	5,900[c]	10,867	88,000[c]	ND
2020		14,688		14,688		ND
2021		11,004		6,550		49,267[d]
2022		10,362 (12,454)[e]		4,606		28,687+[d]
2023		13,968 [f]		ND		ND
2024		15,696[g]		ND		ND

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

[b] Estimated from Navy data in Figure 4 graph 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%202%20-%20DETERMINATION%20OF%20EFFECT.PDF

[c] Source: Final EIS, Tables 4.1-3 and 4.1-5.

[d] 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 was for January through August, so total number of operations for the year would have been somewhat higher, probably very similar to 2021.

[e] Hypothetical totals had OLF not been closed for repairs during July & August.

[f] Estimate based on 99 documented days of flying at the OLF in 2023 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, 99 × 144 = 14,256 operations for the year.

[g] Estimate; see Table 6 for explanation.

– Appendix D –

FEIS Misinforms on APZs and Risks

Under the Navy's Record of Decision, Track 32 for Outlying Landing Field Coupeville (OLFC) will experience 8000+ annual FCLP operations at both ends of the runway, which exceeds the 5000 operations threshold for establishment of Accident Potential Zones (APZs). Whether the County adopts the Navy APZs (Figure 1) or not has no bearing on the attendant risk factor. Either way the mishap risks for potential disaster remain the same.

EIS Understates APZs

Airport clear and accident potential zones (APZ 1 and 2) are based on standard landing and takeoff practices in which the aircraft on landing and takeoff follow a single centerline or flight line across those zones. The three zones together extend nearly 3 miles beyond the runway. The clear zone (CZ) is flat, open land, free of obstructions and extending 3000 feet from the end of the runway. Beyond that is the APZ-1 and then APZ-2, as depicted by the Department of Defense instruction[18]. The APZ-1 extends 5000 feet beyond the CZ and is 3000 feet wide, or 1500 feet on either side of the flight line. The APZ-2 is the same width and extends another 7000 feet beyond the APZ-2.

An Air Force study of aircraft accidents from 1968 to 1995, found 25% of the accidents occur on or adjacent to the runway (primary surface area"). However, 28% of the accidents occur in the CZ, 10% in the APZ-1 , and 6% in the APZ-2, and hence, these three zones together are the area most likely to experience crashes[19]:

> Because the purpose of the study was to identify accident hazards, the study plotted each of the 369 accidents in relation to the airfield. This plotting found that the accidents clustered along the runway **and its extended centerline.**

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18 https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/416557p.pdf?ver=2019-04-15-094510-673. (See Figure 1 of Appendix 1, page 15).

19 http://www.mncppcapps.org/planning/publications/pdfs/193/Apendix%20B%20Clear%20Zones%20and%20Accident%20Potential%20Zones.pdf (See Figure B.3, page B-6).

Standard APZs were designed from destination-based flights that closely follow a single straight flight line when landing and taking off. The width of the APZ is always measured to be 1500 feet to either side of the narrow flight line. Carrier landing practice (FCLPs) at OLFC, however, do not conform to that boilerplate because the line is not straight but a 180-degree turn. And instead of following a single centerline or flight line, they follow at least three discrete flight lines (or tracks), as shown in Figure 2. The APZs proposed by the Navy (Figure 1) were measured from the central flight line (i.e., 32FCP2 and 14FCP2 in Figure 2), but the pilots in reality use three flight lines to provide space between the 4 or so jets in the touch/go loop and because of other technical variables. So, instead of a narrow flight line the FCLP pilots at the OLF are flying in a path or corridor about 2000 feet wide.

Hence, the APZ should extend 1500 feet from either side of the path[20], not from the center line of the path. Were the APZs corrected in that way, the outer edge would very nearly abut with the high school and the daycare center, as well as the business district. Note that the F-18 crash in Virginia Beach was just outside the APZ (https://youtube.com/watch?v=iR_PcZPy-6g).

The FCLP altitudes exacerbate risks. The turns on approach and just after takeoff are only about 300 to 600 feet above ground level, well less than the safe altitude requisite for commercial aircraft, and commercial aircraft have a multiples-better safety record than military aircraft.

The APZ representation presented by the Navy ignores and disrespects Department of Defense Instruction, number 4165.57, May 2, 2011, Incorporating Change 3, August 31, 2018 (page 10)[21], which calls for APZs to be be adjusted to properly accommodate multiple flight track risks:

> (1) Where multiple flight tracks exist and significant numbers of aircraft operations are on multiple flight tracks, modifications may be made to create APZs that conform to the multiple flight tracks.

As stated above, the whole purpose of the CZ and APZ is to identify areas of greatest crash risk, not hide or distort those areas. Instead of presenting APZs that reflect the actual risk, the Navy zeroed out nearly half of the true risk area.

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20 The path for runway #32 is the area in Figure 2 between flight path 32FCP1 and 32FCP3 and for runway #14 it is the area between flight path 14FCP1 and 14FCP3.

21 https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/416557p.pdf?ver=2019-04-15-094510-673

That masking and hiding of risk cannot be rationally defended, and the Navy needs to be held to account for and correct the misleading impacts.

But it gets worse. The actual takeoff turns at their apex are almost always 1/4 to 3/4 miles outside the widest paths depicted in Figure 2 for both tracks #14 and #32. That error were it corrected to reflect the actual rather than fake paths used, it would put the schools squarely in the APZ.

Photo of a Growler FCLP loop crossing Fort Casey at Terry Road and about 600 yards from Coupeville schools. A video on another day was even closer to the schools: https://www.youtube.com/watch?v=pSoj-bvyvh8 .

Allowing that flight track misrepresentation to stand seems to reflect a need to avoid non-compliance with Executive Order (EO) 13045. That order requires the Navy to evaluate the effects of planned federal actions on children and explain

why its proposed action is preferable to other potentially effective and reasonably feasible alternatives. Instead of dealing forthrightly with EO-13045, the Navy's obfuscation of the APZ facilitated the following conclusion (EIS Page 4-179):

> However, as described in Section 3.3.2.4, unless there is a place where children congregate within an APZ, such as a school, there would not be a disproportionate safety risk to children. **There are no schools or daycare centers** within the existing Clear Zones, existing APZs or conceptual APZs at Ault Field and OLF Coupeville under any of the alternatives or scenarios. A small portion of Rhododendron Park falls within the Clear Zone and within the conceptual APZs at OLF Coupeville. **However, this area of the park is used for passive recreation and is not expected to be an area where children congregate.** Therefore, there are no disproportionate environmental health and safety risks to children as a result of possible aircraft mishaps under any alternative or scenario for both the average year and high-tempo FCLP year. [Emphasis added]

Those conclusions are false: The daycare center, the youth athletic fields, and the swimming pools are all places where youth congregate. In addition, the Admirals Cove Beach Club Olympic-sized swimming pool is an area where youth congregate (swim lessons) is in the APZ-1. And using honest APZ designations Coupeville's high school and middle school and a daycare center lie in or within just a few feet off the APZs for track 32.

The Navy's misrepresentation of actual flight tracks and APZs and their related hiding of the disproportionate risks to children cannot be rationally defended or morally rationalized.

Figure 1. The 3000-foot-wide APZs 1 and 2 as projected in the EIS plans for Outlying Field Coupeville (source DEIS Figure 4-3-2).

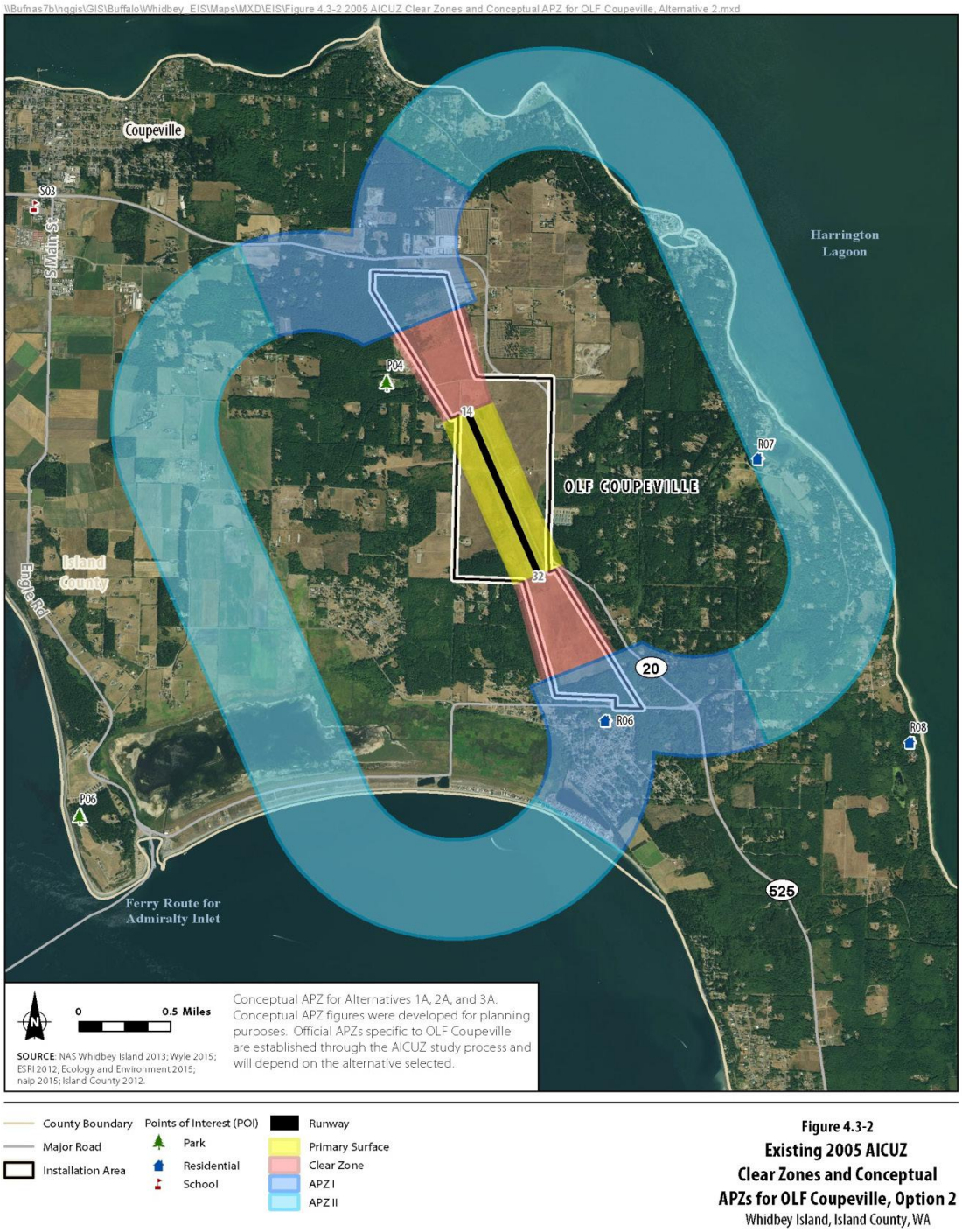

Figure 4.3-2
Existing 2005 AICUZ Clear Zones and Conceptual APZs for OLF Coupeville, Option 2
Whidbey Island, Island County, WA

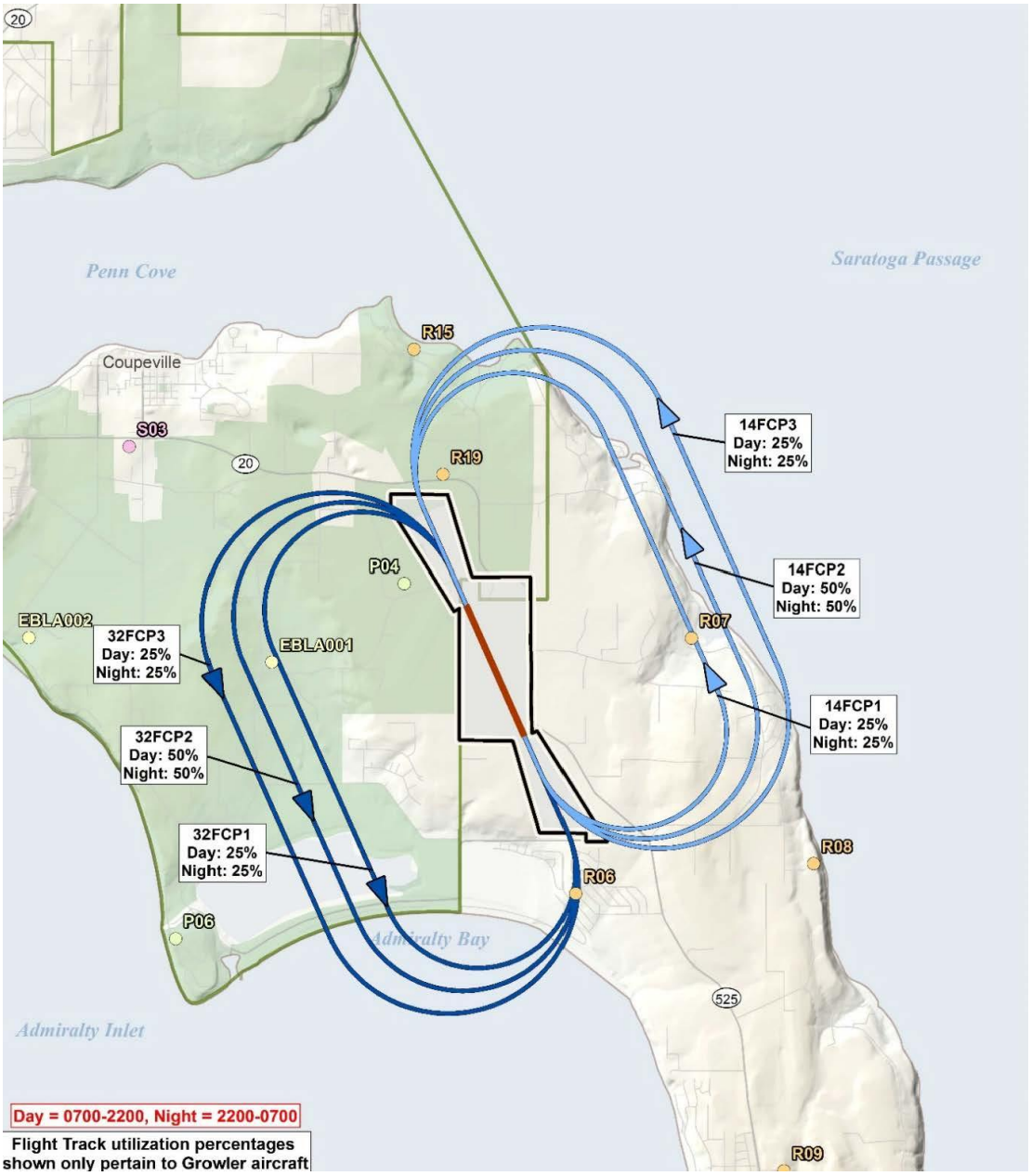

Figure 2. Field carrier landing practice (FCLP) flight tracks for used by Growlers at OLF Coupeville. Flight tracks are designated in light blue (Track 14) and dark blue (Track 32). Noise measurement locations (yellow circles) analyzed by Navy noise modeling are labeled with their identification codes (Source Final Environmental Impact Statement).

– Appendix E –

Soundoff Published in Whidbey News Times, August 2023

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