



DEPARTMENT OF THE NAVY  
OFFICE OF THE ASSISTANT SECRETARY  
(ENERGY, INSTALLATIONS AND ENVIRONMENT)  
1000 NAVY PENTAGON  
WASHINGTON DC 20350-1000

November 30, 2018

Mr. John Fowler  
Executive Director, Advisory Council  
on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

Reference: Notice of Termination of Consultation for EA-18G Growler Airfield Operations

Dear Mr. Fowler:

After careful consideration, I find it necessary to notify the Advisory Council on Historic Preservation (ACHP) of my decision to terminate consultation under Section 106 of the National Historic Preservation Act (NHPA) to resolve adverse effects to historic properties resulting from the proposed increase in EA-18G Growler airfield operations at Naval Air Station Whidbey Island Complex.

Despite our best efforts to reach agreement among the parties, there remains a disagreement on the type and amount of mitigation appropriate to resolve adverse effects to historic properties that would result from the undertaking. At this time, operational requirements dictate that the Navy make a decision on the undertaking. For these reasons, I have determined that further consultation is no longer productive. I have enclosed an Executive Summary detailing our decision to terminate; supporting information is included in Attachments 1-7.

In accordance with 36 C.F.R. 800.7(a)(1), I request the ACHP comment on this matter. By this letter I also provide notice of termination to the Washington State Historic Preservation Officer (SHPO) and other consulting parties.

The Navy recognizes its responsibilities to protect the historic district and the contributing rural landscape, and I believe the measures that the Navy offered during the consultation process reflect an appropriate response to the effects of the undertaking. In addition, as a member of the Whidbey Island community, the Navy will continue to seek ways to alleviate community concerns related to increased airfield operations. The Navy's commitment to its role as a community member extends well beyond completion of these NHPA actions.

Thank you for your prompt attention to this matter.

A handwritten signature in blue ink, reading "Karnig Ohannessian".

Karnig Ohannessian  
Department of the Navy  
Federal Preservation Officer

Enclosure: Executive Summary

Attachments:

1. Consultation History to date with key documents
2. Navy's Determination of Adverse Effect
3. Consultation Plan provided to consulting parties on July 24, 2018
4. Navy proposed resolutions in the Draft Memorandum of Agreement (MOA) of September 27, 2018
5. Navy proposed resolutions in the Revised Draft MOA of November 7, 2018
6. Operational impacts of Growler consultation timeline
7. SHPO Letter of November 29, 2018 Rejecting the Navy's Final Offer

Copy to:

Ms. Maryon Attwood, Citizens of Ebey's Reserve  
Mr. Jim Baumgart, Office of the Governor  
Dr. Allyson Brooks, Washington State Historic Preservation Office  
Mr. David Day, citizen  
Ms. Jackie Ferry, Samish Tribe  
Ms. Kristen Griffin, Trust Board of Ebey's Landing National Historical Reserve  
Ms. Molly Hughes, Town of Coupeville  
Ms. Josephine Jefferson, Swinomish Tribe  
Mr. Adam LeMieux, Office of Congressman Larsen  
Mr. Dennis Lewarch, Suquamish Tribe  
Ms. Kerry Lyste, Stillaguamish Tribe  
Ms. Helen Price Johnson, Island County Commissioners  
Ms. Deborah Stinson, City of Port Townsend  
Mr. Richard Young, Tulalip Tribes  
Mr. Roy Zipp, National Park Service at Ebey's Landing National Historical Reserve