



STATE OF WASHINGTON
Office of the Governor

October 26, 2018

Mrs. Phyllis L. Bayer
Assistant Secretary of the Navy
Energy, Installations and Environment
1000 Navy Pentagon
Washington, DC 20350

Dear Mrs. Bayer:

Thank you for the opportunity to provide additional feedback on the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island (NASWI) Complex. Please consider this letter my response to the Final EIS released by the U.S. Navy on September 28, 2018.

The Navy's proposed undertaking as currently presented is unacceptable to the state of Washington.

The State of Washington understands the capabilities provided by the aircraft stationed at NASWI are an integral component of our national defense strategy. We recognize the U.S. Navy requires additional electronic warfare capabilities and determined their preferred alternative will bring an additional 36 aircraft to the installation. However, this addition is expected to result in a 25 percent increase to flight operations, which will result in significant adverse impacts to the community and surrounding areas including, but not limited to, impacts to the local education system, housing, and residents' health and quality of life. I am personally familiar with the profound negative effect that the noise associated with additional EA-18G Growlers has across the broader community. The noise level as currently outlined in the EIS is unacceptable and unsustainable without significant mitigation and necessitates a commitment by the U.S. Navy to address and mitigate the short-term and long-term adverse impacts in Washington.

1. Public Education. NAS Whidbey has experienced significant growth over the last decade. The arrival of three maritime patrol and reconnaissance wings and the proposed expansion to Growler operations will cause additional stress to public infrastructure. Of particular concern is the strain on our public education system and housing availability in the region.

The Oak Harbor School District serves approximately 70 percent of Navy-dependent school children assigned to NASWI, accounting for roughly 50 percent of the total school district enrollment. While the state has made considerable investments in public education, Oak Harbor School District is still forced to use 42 portable classrooms to teach our children. These classrooms lack en suite restrooms, are physically separated from the rest of the school, and expose children to the elements when transitioning to and from the main building. At my request, the Department of Defense Office of Economic Adjustment (OEA) surveyed two of the schools in the district and recommended facility improvements. The Navy's own analysis acknowledges the "serious overcrowding issues already facing the Oak Harbor School District" and indicates that "the potential increase of between 121 and 226 additional students would further exacerbate the overcrowding problem and have a significant adverse impact on the district." Additionally,



it is estimated that students in the Crescent Harbor Elementary School will experience greater than 4,000 events per year where sound exceeds 80 dBs due to aircraft noise.

I strongly urge you to prioritize OEA's recommendations and commit to making additional investments to move our school children out of portable classrooms and into a more conducive learning environment. Increased resources through the Impact Aid program to Oak Harbor School District for ongoing operation and maintenance of the facilities is also essential.

2. Housing. The entire state of Washington is experiencing a severe shortage of housing. According to the University of Washington's Runstad Center, apartment rental vacancy rates across the state remain below 3.5 percent, and available homes for sale are at less than two months' inventory. Both of these statistics are concerning where demand exceeds supply. The vacancy rates in Whidbey Island are slightly better than elsewhere in the state, yet remain far below healthy market conditions of 7 percent. As you know, Whidbey Island is geographically isolated. As such, Navy personnel have limited options to live within the community and may be pushed farther away from the installation, increasing commute times, adding to congestion and reducing time spent with their families. There are a limited number of routes to enter and depart the island, consisting of two ferries and one highway through Deception Pass. Those living off-base and outside Whidbey are subject to a longer recall notice in order to get to the installation.

The Navy's own analysis reflects these serious conditions and the adverse impacts of increasing Growler operations at NAS Whidbey. In its EIS, the Navy acknowledges the influx of additional Navy personnel is expected to exacerbate the regional demand for housing, worsen the housing affordability crisis, increase rental and property prices, and have a particularly negative impact on low-income residents who already struggle to afford the cost of housing. Given these considerations, I urge the Navy to work with local planning organizations to determine ways to address housing affordability and access including, but not limited to, the development of more on-base housing and federal investments in infrastructure to account for regional impacts to housing development.

3. Land Acquisition. Within the EIS, the Navy has identified areas where the sound level is above 90 dB using a maximum A-weighted sound study. In these locations, and where applicable, the Navy should develop land acquisition strategies to accommodate this adverse impact on residents' health and quality of life. This should not be a large-scale strategy to depopulate the area, but rather a voluntary program offered to residents in addressing specific locations based on associated levels of risk.

4. Acoustic Reduction. Communities across the United States struggle with aircraft engine noise generated during take-off at both commercial and military airfields. The Navy should establish an acoustic reduction initiative focused on diffusing engine noise during take-off and bring a team of engineers to NASWI to develop and implement technology for use in airfield operations that achieves a 10 dB reduction in noise within the next five years. This program should complement the efforts underway to create a hush house that will reduce noise generated during engine testing and run-ups.

5. Platform Diversification. Currently, the entirety of the Navy's electronic warfare (EW) systems reside on the EA-18G Growler. The Navy mission does not preclude consideration of diversifying the electronic warfare systems to other platforms including carrier launched drones, tethered military balloons, or existing carrier based platforms such as the MV-22 Osprey or C-2 Greyhound. For those missions that do not involve contested airspace, a broader array of EW platforms may provide better options for the Navy while reducing the long-term impact of Growler operations at NASWI.

6. Commitment to Reduce Aircraft Engine Noise. Similar to the commercial aviation industry's commitment to reduce aircraft engine noise, the Navy and the Department of Defense should commit to reducing engine noise on all future military aircraft designs. This should be achievable while maintaining

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all desired performance characteristics. This commitment will not only help maintain U.S. service member health by reducing tinnitus and other medical conditions that arise from occupational noise, but will also contribute to stronger community relations as the Navy relies more on established local training areas near their installations.

7. Cultural and Historic Properties. The State of Washington remains in consultation with the U.S. Navy in respect to Section 106 of the National Historic Preservation Act of 1966 following the U.S. Navy determination of adverse effect to cultural and historic properties in Central Whidbey Island. The adverse effect negatively impacts the historic and cultural setting, association and feeling within the community. To mitigate this effect, the U.S. Navy should provide funding to stabilize historic barns and structures as well as soundproof historic homes, helping to preserve the sense of community in this unique setting.

I appreciate your consideration of these comments as you move toward completion of the Record of Decision on Growler Airfield Operations at NASWI. Washington is proud to host installations for our nation's armed forces. We ask that the Navy commit to working in a productive and collaborative manner to address adverse impacts on our education system, housing market, and the health and quality of life of Washington's residents. We are honored to support our military communities and the nation's defense.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay Inslee", written in a cursive style.

Jay Inslee
Governor